M2Green Redevelopment, LLC's Response to
United States Environmental Protection Agency Region 8's
Requests for Information
Smurfit-Stone Mill Site, Missoula County, Montana
June 28, 2013

Sharon Abendschan
U.S. Environmental Protection Agency
Region 8 (8ENF-RC)
1595 Wynkoop Street
Denver, CO 80202-1129

RE: *Response to Requests for Information;*
Smurfit-Stone Mill Site in Missoula County, Montana

Dear Ms. Abendschan:

M2Green Redevelopment, LLC (hereinafter "M2Green") is responding to the United States Environmental Protection Agency's ("EPA") April 3, 2013, Request for Information pursuant to Section 104(e) of CERCLA, 42 U.S.C. § 9604(e) (the "Request"), relating to the Smurfit-Stone Mill Site, located at 14377 Pulp Mill Road near the city of Missoula, Missoula County, Montana (the "Site"). The specific responses to the Request are set forth below.

Documents responsive to the Request are enclosed with these written responses,[1] are being provided under separate cover in the case of any confidential information, or, as noted herein, will be made available to EPA for inspection. M2Green has conducted a thorough search for documents that may be responsive to the Request. In the event that additional responsive documents in M2Green's possession as of the date of the Request are located, they will be produced to EPA. In addition, M2Green reserves the right to designate any information it produces as Confidential Business Information in accordance with 40 C.F.R. Part 2.

Neither M2Green's responses nor the documents provided with these responses constitute an admission by M2Green of liability with respect to the Site, nor any admission or representation concerning the conditions on or surrounding the Site or any acts or omissions of any persons concerning the Site. M2Green's production of documents does not constitute an admission by M2Green that the contents of the documents are true, correct, or accurate, nor does it constitute an admission that the documents are authentic for the purposes of admissibility in any judicial or administrative proceeding. M2Green denies that it has any liability relating to any releases or threatened releases at the Site.

[1] Responsive documents are being included with these responses in hard copy and electronically on a CD. *Also see* response to Request 4.

Based upon information available to it, M2Green responds, to the best of its knowledge, as follows:

I. General Objections

1. M2Green objects to the Requests on the grounds that they are vague and ambiguous.

2. M2Green objects to the Requests on the grounds that they are overbroad and unduly burdensome.

3. M2Green objects to the Requests to the extent that they seek information or documents that are protected under the attorney-client privilege, the work product doctrine or any other available privilege or protection. M2Green is withholding certain documents currently in its possession which it asserts are covered by the attorney-client privilege and/or work product doctrine.

4. M2Green objects to the Requests to the extent that they call for legal conclusions.

5. M2Green objects to the Requests to the extent that they attempt to impose upon M2Green an obligation to obtain information from third parties where the law does not impose such an obligation.

6. M2Green objects to the Requests to the extent they seek to require the production of information beyond the scope permitted by 42 U.S.C. § 9604(e). Under section 9604(e), the President may only request information relating to (1) the identification, nature and quantity of materials which have been or are generated, treated, stored or disposed of at the facility, or transported to a facility; (2) the nature or extent of a release or threatened release of a hazardous substance or pollutant or contaminant at or from a facility; or (3) the ability to pay for or perform a cleanup. *See* 42 U.S.C. § 9604(e)(2).

7. M2Green objects to all responses which require M2Green to "identify" and "describe" the documents that may be responsive; the documents M2Green is producing speak for themselves.

II. Objections to Instructions and Definitions

1. M2Green objects to Instruction No. 4, requiring that it identify each document consulted in the preparation of each answer, as unduly burdensome and outside the scope of 42 U.S.C. § 9604(e). In response to EPA's Request, M2Green is producing a substantial number of documents that were consulted in the preparation of these responses. EPA is in the best position to determine the relevance of each document to any given response.

2. M2Green objects to the definition of "document" and "documents" as overly broad and unduly burdensome.

3. M2Green objects to the definition of "identify" as overly broad and unduly burdensome, and because it may require M2Green to provide information outside the scope of 42 U.S.C. § 9604(e). In addition, M2Green objects to the term to the extent it improperly requires legal conclusions. With respect to the identification of specific documents, M2Green states that each document speaks for itself.

4. M2Green objects to the definition of "materials" as vague, overly broad and unduly burdensome.

5. Consistent with instruction No. 5 in the Requests and applicable laws and regulations, M2Green is asserting, and may in the future assert, confidentiality claims over certain documents produced or to be produced in connection with this response. Pursuant to 40 CFR 2.203(b), M2Green has separated these documents into a separate group of documents to facilitate agency handling of confidential business information.

III. Responses

M2Green reserves the right to amend its answers if and when additional information becomes available which is relevant to these Requests. M2Green incorporates each of its General Objections and Objections to Instructions and Definitions into each response provided below. Without waiving these objections or admitting any liability with respect to the Site, M2Green answers as follows:

1. Identify the person(s) answering these responses on behalf of Respondent.

Response to Request 1: The responses to these requests were prepared by the following people:

Raymond S. Stillwell, Esq.
M2Green Redevelopment, LLC
601 E. Third Street, Ste. 302
P.O. Box 249
Alton, Illinois 62002
(618) 465-7277 (main)
(618) 465-7968 (fax)

Neal Marxer
M2Green Redevelopment, LLC
14377 Pulp Mill Road
Missoula, MT 59808
(406) 626-5293

Elizabeth Temkin, Esq.
Ryan Sklar, Esq.
Temkin Wielga & Hardt, LLP
1900 Wazee Street, Suite 303

Denver, CO 80211
(303) 292-4922 (main)
(303) 292-4921 (fax)

2. Identify the person(s) whom you wish to receive all further communications from the EPA related to the Site.

Response to Request 2: Future correspondence should be directed to:

Raymond S. Stillwell
M2Green Redevelopment, LLC
601 E. Third Street, Ste. 302
P.O. Box 249
Alton, Illinois 62002
(618) 465-7277 (main)
(618) 465-7968 (fax)

Neal Marxer
M2Green Redevelopment, LLC
14377 Pulp Mill Road
Missoula, MT 59808
(406) 626-5293

Elizabeth Temkin, Esq.
Temkin Wielga & Hardt, LLP
1900 Wazee Street, Suite 303
Denver, CO 80211
(303) 292-4922 (main)
(303) 292-4921 (fax)

3. For each and every Question contained herein, identify all persons consulted in the preparation of the answer.

Response to Request 3: Persons consulted in the preparation of these responses include:

Patrick Clevenger
Neal Marxer
Michael Stillwell
Raymond Stillwell
Mark Spizzo

4. For each and every Question contained herein, identify documents consulted, examined, or referred to in the preparation of the answer or that contain information responsive to the Question and provide accurate copies of all such documents.

Response to Request 4: M2Green is either providing or making available all relevant documents it has located in response to EPA's requests. Documents are grouped by response

numbers for convenience only. EPA may determine the relevance of each document to each request.

5. Describe the relationship between MLR Investments, LLC and Green Investment Group, Inc. as it relates to the Site. Provide copies of all documents related to each relationship, including, but not limited to, merger agreements, purchase agreements, property transfer documents, and assumptions of liability.

Response to Request 5: M2Green objects to the term "relationship" as undefined, vague, ambiguous and improperly calling for a legal conclusion. Without waiving this objection, M2Green states that it is not aware of any relationship between MLR Investments, LLC and Green Investment Group, Inc. as it relates to the Site.

6. Identify and provide copies of all arrangements, including contracts, relating to the Site between MLR Investments, LLC and M2Green LLC and provide copies of all documents relating to or evidencing such arrangements or contracts.

Response to Request 6: M2Green objects to the use of the term "arrangements" as vague, ambiguous and improperly calling for a legal conclusion. Without waiving this objection, M2Green is providing the following documents in response to this request:

- Agreement for Purchase and Sale of Real Property and Assets between MLR Investment, LLC and M2Green Redevelopment, LLC, dated as of May 3, 2011.

- Bill of Sale from MLR Investment, LLC to M2Green Redevelopment, LLC.

- Quitclaim Deed from MLR Investment, LLC to M2Green Redevelopment, LLC, dated as of May 3, 2011.

7. Identify and provide copies of all arrangements, including any contracts, relating to the Site between Green Investment Group, Inc. and M2Green LLC and provide copies of all documents relating to or evidencing such arrangements or contracts.

Response to Request 7: M2Green objects to the use of the term "arrangements" as vague, ambiguous and improperly calling for a legal conclusion. Without waiving this objection, M2Green states that Green Investment Group, Inc. and M2Green both are Illinois corporate entities in good standing and there are no written contracts or agreements between them related to the Site. The two entities share the same legal address.

8. Describe the Respondent's activities at the Site including the following and provide copies of all documents relating to such activities:

   a. the date Respondent acquired the Site;
   b. the entity from which Respondent acquired the Site;
   c. a description of Respondent's operations at the Site;

d. any changes Respondent made to the Site including any demolition or improvements;
e. the activities taken upon cessation of operations at the Site;
f. the date Respondent transferred all or a portion of the Site, and the entity to which the Site was transferred.

Response to Request 8: M2Green responds to Request 8 as follows:

a. M2Green acquired the Site on May 3, 2011.
b. M2Green acquired the Site from MLR Investment, LLC. *Also see* response to Request 6.
c. M2Green's activities at the Site have consisted of the removal and sale of used equipment, the demolition of various structures on the Site and the sale of resulting scrap material. Prior to demolition, M2Green inspected all structures for the presence of asbestos. M2Green obtained asbestos removal permits from the Montana Department of Environmental Quality ("MDEQ") and hired Abatement Contractors of Montana, LLC to remove, transport and dispose of all asbestos found during these inspections. M2Green sold the scrap metal resulting from the demolition, and stockpiled onsite other types of material, including pieces of treated wood, painted wood, sheet rock, cinder blocks, fiberglass insulation and siding, roofing material and old office furniture. Some of this waste material has been sent to the Republic Services, Inc. landfill in Missoula, Montana, and the remainder of this waste material will be sent to an off-site landfill in the future. Large pieces of clean concrete and large pieces of concrete with rebar flush cut were placed in the onsite Class III landfill, which is covered at the end of each quarter, as required by the MDEQ. Smaller pieces of concrete containing rebar were stockpiled onsite. M2Green is going through this stockpile, removing the rebar, crushing the concrete and saving the crushed concrete for redevelopment work at the Site. M2Green also covered the area between sludge ponds 3, 4 and 5 with wood chips, and flooded sludge ponds 5 and 17 with water, to prevent windblown dust from leaving the Site. See map included with this response.
d. See response to Question 8.c.
e. M2Green's activities at the Site are ongoing.
f. M2Green transferred 158.48 acres of land at the Site to Lucier Land, LLC on December 30, 2012. M2Green is providing the following documents that are responsive to this request:

- Agreement for Sale and Purchase of Real Property between M2Green Redevelopment, LLC and Lucier Land, LLC, dated December 30, 2012.

- Amendment to Agreement for Sale and Purchase of Real Property between M2Green Redevelopment, LLC and Lucier Land, LLC, dated December 31, 2012.

9. Describe and, where available, provide maps and construction drawings that describe the physical characteristics of the Site and all changes that Respondent has made to the Site, including, but not limited to, the following:

   a. surface structures;
   b. waste impoundments;
   c. roads.

Response to Request 9: M2Green is providing documents in response to this request. M2Green states that it has made no changes to roads on the Site.

10. Provide copies of all documents regarding environmental conditions at the Site including, but not limited to, any sampling information, solid and hazardous waste management plans, and any known releases of hazardous substances.

Response to Request 10: Pursuant to the telephone conversation among Ms. Amelia Piggott, Ms. Temkin and Mr. Sklar, M2Green will make available documents in response to this request at the offices of Temkin, Wielga & Hardt LLP, located at 1900 Wazee Street, Suite 303, Denver, CO 80202.

11. Describe all waste materials that resulted from Respondent's activities at the Site. Describe the location and method of storing waste. Identify any hazardous substances contained in such wastes and provide copies of any and all documents that describe any analysis of such wastes and the results of the analysis.

Response to Request 11: M2Green objects to the use of the term "waste materials" as undefined, vague and ambiguous. Without waiving this objection, M2Green is providing documents that are responsive to this request. M2Green states that asbestos was the primary waste material that has resulted from its activities on the Site. During the demolition activities discussed in response to Request 8, M2Green also encountered small amounts of black liquor, sodium sulfate and rosin size, which were placed in sludge pond 4.

12. Provide copies of any and all permits issued by state or federal agencies related to Respondent's activities at the Site.

Response to Request 12: M2Green is providing the following documents in response to this request:

- Montana Department of Environmental Quality, Operating Permit #OP2589-07
- Montana Department of Environmental Quality, Montana Air Quality Permit #2589-16
- Montana Department of Environmental Quality, Discharge Permit MT0000035
- Montana Department of Environmental Quality, Minor Class III Landfill License Number #359

- Montana Department of Environmental Quality, Annual Asbestos Project Permit MTF11-0003-00

- Montana Department of Environmental Quality, Annual Asbestos Project Permit MTF12-0022-00

13. Identify companies or individuals that Respondent hired to perform work at the Site. Provide all documentation, including contracts, pertaining to this work. Include information about the purpose of and documentation related to Respondent's contracts at the Site.

Response to Request 13: M2Green objects to the term "work" as undefined, vague and ambiguous. M2Green states that it has hired the following companies to perform key, physical activities at the Site, largely in connection with demolition work at the Site. M2Green is also providing documents in response to this request.

Abatement Contractors of Montana
Advanced Explosives Demolition
Aero Power Vac. Inc.
Affinity Environmental
Calbag
Dick Lucier Excavation
Elder Demolition
Explosive Services, Inc.
Fister Electric
Hydrometrics, Inc.
Industrial Technologies
Little Bear Construction
Otto's Towing & Crane
Smart Consulting, LLC
Weld Tech
Western States Equipment

14. Provide copies of all casualty, liability and/or pollution insurance policies, and any other insurance contracts relating to the Site under which Respondent may assert a claim, including but not limited to comprehensive, general liability, primary, umbrella and excess policies, as well as any environmental impairment liability or pollution legal liability insurance.

Response to Request 14: M2Green is providing the following documents in response to this request:

- Pollution Legal Liability Select Policy, PLL 18256236

- General Liability Policy, PM G24914860 004

- Umbrella Liability Policy, XOO M00567954

- Commercial Property Policy, 0100004327-1

15. If there are any such policies from Question 14 above of which you are aware but neither possess copies, nor are able to obtain copies, identify each such policy to the best of your ability by identifying:

    a. The name and address of each insurer and of the insured;
    b. The type of policy and policy numbers;
    c. The per occurrence policy limits of each policy; and
    d. The effective dates for each policy.

Response to Request 15: M2Green is only aware of the policies being provided in response to Request 14.

16. If you have reason to believe that there may be persons able to provide a more detailed or complete response to any Question contained herein or who may be able to provide additional responsive documents, identify such persons and the additional information or documents that they may have.

Response to Request 16: M2Green objects to Request 16 as vague, ambiguous, unduly burdensome and because it requests information outside the scope of 42 U.S.C. § 9604(e). M2Green states that additional persons who may be able to provide more detailed or complete responses, particularly to Request 10, include:

Former Smurfit-Stone Employees or Contractors
Bill Heatley
Roy Cobb
Nina Marie Butler
Terry McLaughlin
Jeff Briggs
Jason Bockel
Laura Kosmalski Howe
Ed Scott
Leff Griffin
Barry Doner
Jim Heath
Robert Boschee
Lisa Graham
Drew Depuydt
Claude Tillitson
Stephen Carrick
Mike Johnson
Carl Murphy
Russell Peterson
Richard Stegner
Terry Steigers
Janele Sullivan
Jack Brazill
Skip Higgins

Steve Hamilton

Montana Department of Environmental Quality Employees

Reed Miner
Jenny Chambers
Jeff May
Dan Walsh
Karen Wilson
Vicki Walsh
Dave Klemp
Debbie Skibicki

CERTIFICATION

I, Raymond S. Stillwell, having been duly sworn and being of legal age, hereby state:

1. I am the person authorized by M2Green Redevelopment, LLC ("M2Green") to respond to the United States Environmental Protection Agency's ("EPA") April 3, 2013, Request for Information pursuant to Section 104(e) of CERCLA, 42 U.S.C. § 9604(e) (the "Request"), concerning the Smurfit-Stone Mill Site located near the city of Missoula, Missoula County, Montana.

2. M2Green has made a good faith attempt to search for documents and other information relevant to the Requests.

3. Subject to the objections and limitations stated above, I hereby certify that, to the best of my knowledge, the attached responses to the EPA's Request are complete, and contain all information and documents responsive to the Requests which M2Green has located to date.

(Signature)

Raymond S. Stillwell
(Name)

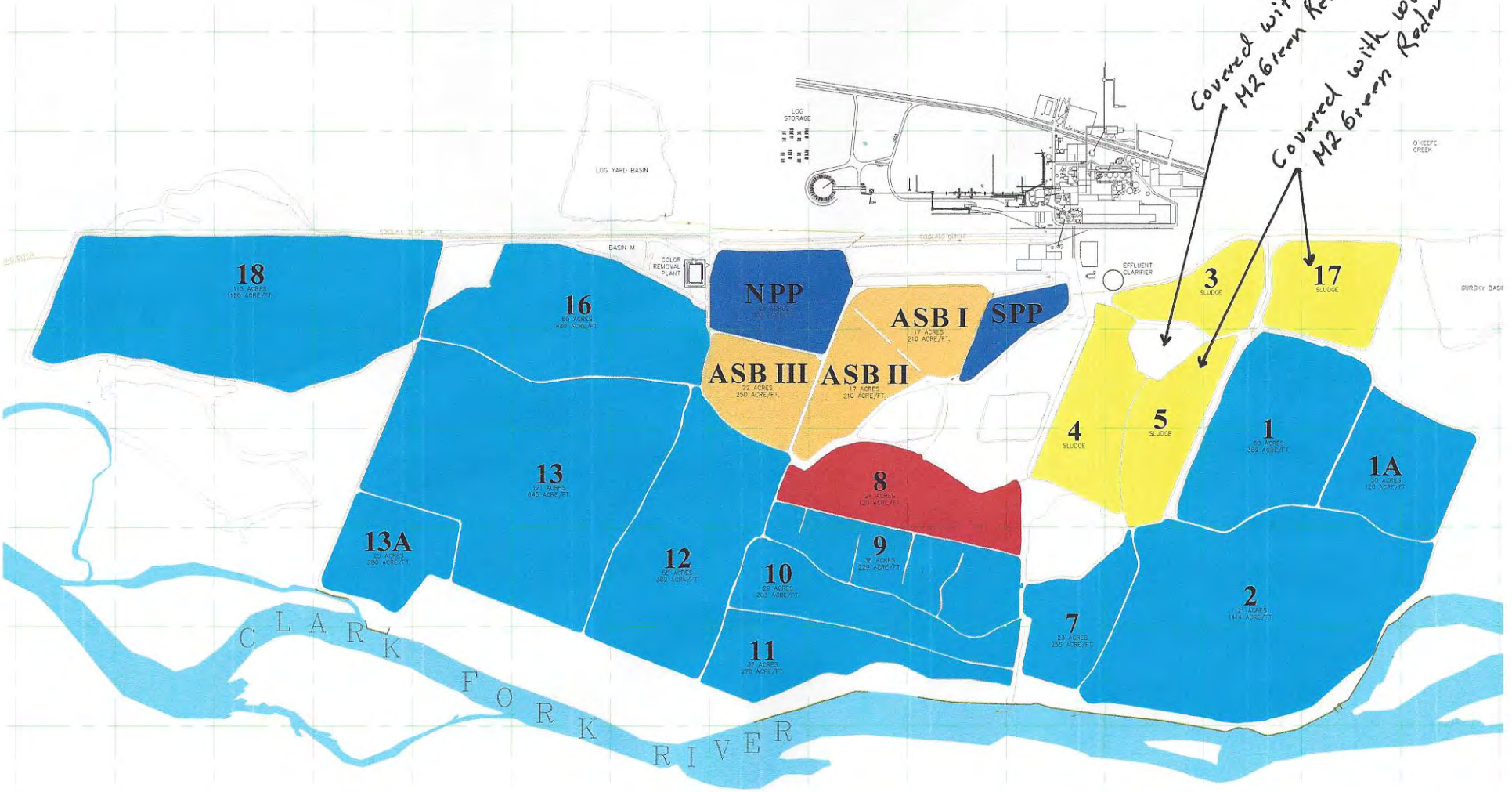
Manager
(Title)

Dated this 27th day of June, 2013.

PROVIDED IN RESPONSE TO REQUEST

8. c

Stone Container Corporation - Missoula Mill



M2G 100001

PROVIDED IN RESPONSE TO REQUEST

9

MULLAN RD.

MULLAN RD.

PULP MILL RD.

SCALE 1"=50'

BUILDING MAINTENANCE

GUARD HOUSE

LOG TRUCK SCALER LOADER

LOG YARD CREW PARKING

51,500

MULTI-FUEL BOILER

WASTE FUEL DUMP

No.5 RECOVERY BOILER

No.4 RECOVERY BOILER

BLF

No.5 EVAPORATORS

No.3 RECOVERY

KAMYR

BATCH DIGESTERS

RECAUST

WASHING & SCREENING

T.C.F.B.M.P. SCREENING

ABANDONED BLEACH PLANT

CHEMICAL MIXING

No.1 PAPER MACHINE

No.2 PAPER MACHINE

No.3 PAPER MACHINE

PRODUCTION WAREHOUSE

OFFICES

SHOP BUILDING

STORAGE SHED

BFI DUMPSTERS

COOLING DITCH ROAD

O.C.C. WAREHOUSE

O.C.C. PLANT

MONTANA POWER COMPANY SUBSTATION

SLUDGE DEWATERING FACILITY

CLARIFIER

COLOR REMOVAL PLANT

Area in Red demolished

M2G 100002

MULLAN RD.

MULLAN RD.

P.U.D. WELL RD.

SCALE 0'-0"

BUILDING MAINTENANCE

GUARD HOUSE

WASTE FUEL DUMP

MULTI-FUEL BOILER

OFFICES

SHOP BUILDING

STORAGE SHED

51,500

F.O.R.M.H. BUILDING

No.1 PAPER MACHINE

No.2 PAPER MACHINE

No.3 PAPER MACHINE

PRODUCTION WAREHOUSE

COOLING DITCH ROAD

G.C.C. WAREHOUSE

G.C.C. PLANT

MONTANA POWER COMPANY SUBSTATION

SLUDGE DEWATERING FACILITY

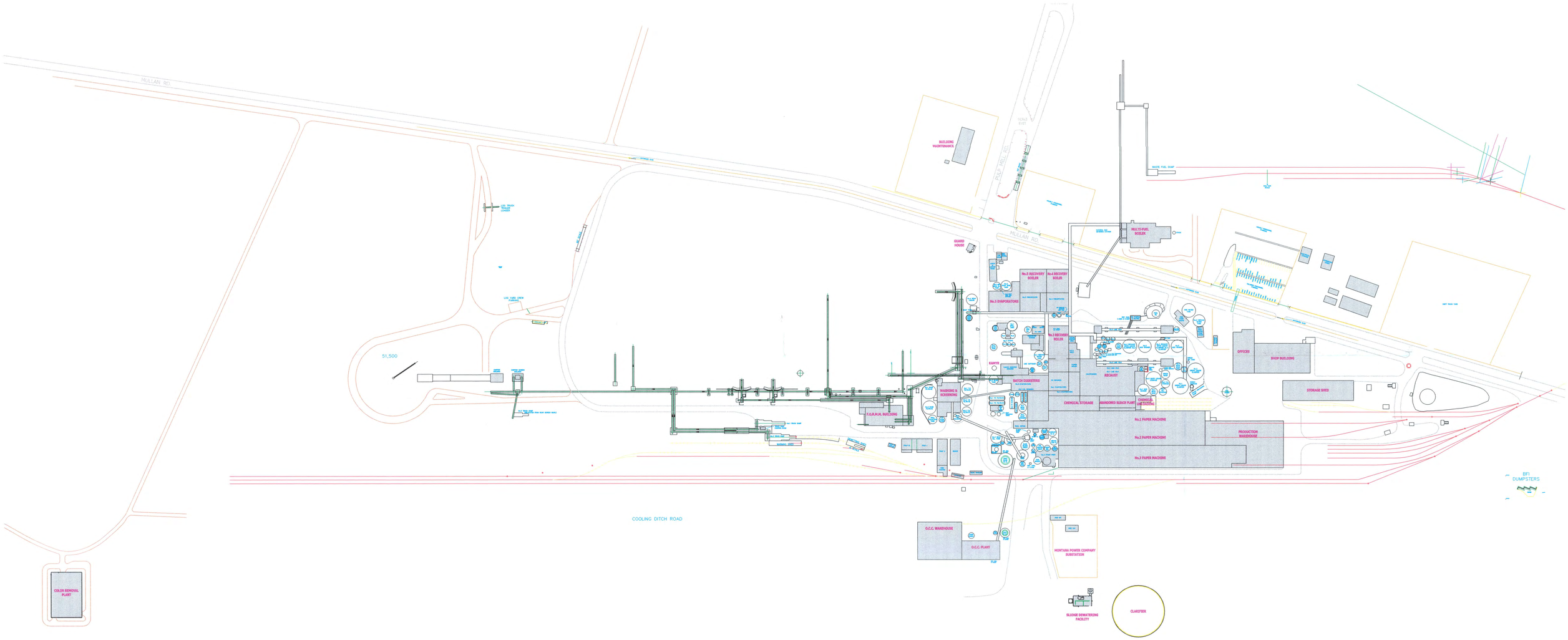
CLARIFIER

COLOR REMOVAL PLANT

BFI DUMPSTERS

After Demolition

M2G 100003

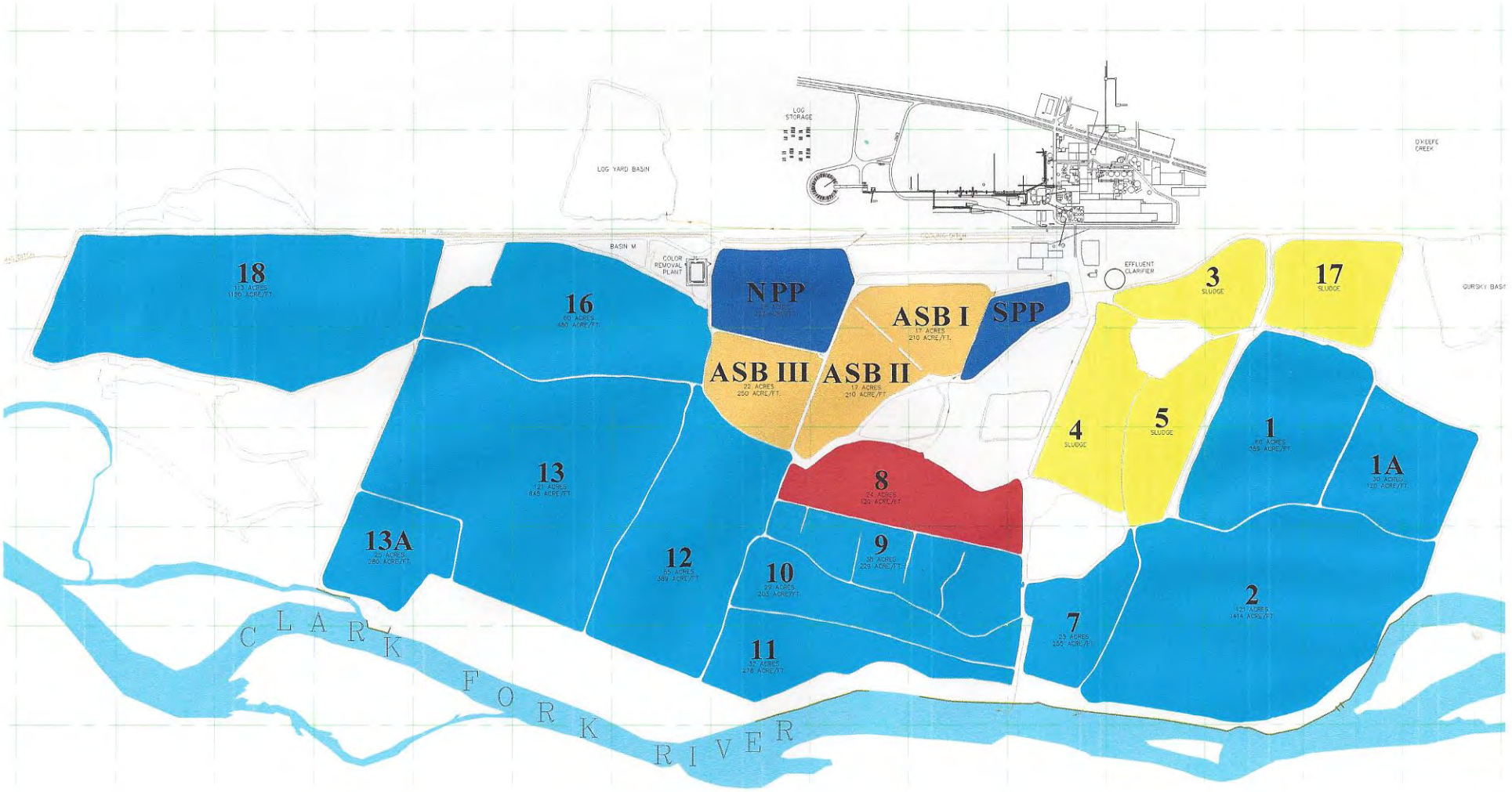


Before Demolition

M2G 100004

Stone Container Corporation - Missoula Mill

M2G 100005



PROVIDED IN RESPONSE TO REQUEST

12

Montana Department of
ENVIRONMENTAL QUALITY
Brian Schweitzer, Governor

P. O. Box 200901 Helena, MT 59620-0901 (406) 444-2544 Website: www.deq.mt.gov

August 9, 2011

Mark Spizzo
M2Green Redevelopment, LLC
c/o Green Investment Group, Inc.
601 E. Third Street, Suite 302
P.O. Box 249
Alton, Illinois 62002

RE: Administrative Amendment for Title V Operating Permit #OP2589-07

Dear Mr. Spizzo:

The Department of Environmental Quality has prepared the enclosed Final Operating Permit #OP2589-07, for M2Green, located in Missoula, Montana. Please review the cover page of the attached permit for information pertaining to the action taking place on Permit #OP2589-07.

If you have any questions, please contact Julie Merkel at (406) 444-3626 or by email at jmerkel@mt.gov.

Sincerely,

Vickie Walsh

Vickie Walsh
Air Permitting Program Supervisor
Air Resources Management Bureau
(406) 444-9741

Julie A Merkel

Julie Merkel
Air Quality Specialist
Air Resources Management Bureau
(406)444-3626

VW: JM
Enclosure
Cc: Christopher Ajayi, US EPA Region VIII 8P-AR
Caron Coate, US EPA Region VIII, Montana Office
Neal Marxer, Facility Contact Person

STATE OF MONTANA
Department of Environmental Quality
Helena, Montana 59620

AIR QUALITY OPERATING PERMIT OP2589-07

Issued to: **M2Green Redevelopment, LLC**
P.O. Box 4707
14377 Pulp Mill Road
Missoula, MT 59806-4707

Final Date: **August 9, 2011**
Expiration Date: **August 20, 2014**

Effective Date: **August 9, 2011**
Date of Decision: **July 8, 2011**

Application Deemed Technically Complete: **June 10, 2011**
Application Deemed Administratively Complete: **June 10, 2011**
Administrative Amendment Application Received: **June 10, 2011**
AFS Number: 030-**063-0006A**

Permit Issuance and Appeal Processes: In accordance with Montana Code Annotated (MCA) Sections 75-2-217 and 218 and the Administrative Rules of Montana (ARM), ARM Title 17, Chapter 8, Subchapter 12, Operating Permit Program, this operating permit is hereby issued by the Department of Environmental Quality (Department) as effective and final on August 9, 2011. This permit must be kept on-site at the above named facility.

Montana Air Quality Operating Permit
Department of Environmental Quality

Table of Contents

Terms not otherwise defined in this permit or in the Definitions and Abbreviations Appendix of this permit have the meaning assigned to them in the referenced regulations.

SECTION I. GENERAL INFORMATION

The following general information is provided pursuant to ARM 17.8.1210(1).

Company Name: M2Green Redevelopment, LLC

Mailing Address: P.O. Box 249

City: Alton State: IL Zip: 62002

Plant Location: 14377 Pulp Mill Road, Section 24, Township 14 North, Range 21 West, Missoula County, Missoula, MT

Responsible Official: Mark Spizzo Phone: (618) 465-7985

Facility Contact Person: Neal Marxer Phone: (406) 626-4451 (ext 848)

Primary SIC Code: 2631

Nature of Business: Production of linerboard used to make corrugated boxes.

Description of Process: M2Green's Missoula Mill is located close to Frenchtown, which is 10 miles northwest of Missoula. The mill produces unbleached linerboard products from a combination of sawmill residuals (sawdust and chips), roundwood, and recycled fiber. Pulp is produced in batch and continuous pulping digesters using the Kraft (sulfate) cooking process. Recycled fiber is also recovered from post-consumer paper sources on the recycling fiber line. Other major processes include raw materials handling, steam and energy production, chemical recovery, paper production, and finished product handling and shipping. The mill has environmental control systems for air emissions and mill effluent.

The mill is divided in this permit into five major processes: 1) the Pulp, Chip Dock, and Recycled Fiber Department, 2) the Paper Mill Department, 3) the Power, Recovery and Recausticizing Department, 4) the Environmental and Technical Department, and 5) the Engineering and Maintenance Department.

The mill's daily limits are defined by a mill day running from 5:00 am to 5:00 am.

SECTION II. SUMMARY OF EMISSION UNITS

The emission units regulated by this permit are the following (ARM 17.8.1211):

Emission Unit ID	Description	Pollution Control Device/Practice
	PULP CHIP DOCK AND RECYCLED FIBER DEPARTMENT	
EU004	**Sawdust Handling**	Covered conveyors & limited drop heights
EU004a	Sawdust Fines to Hog Fuel (& chip screening fines)	
EU004b	Sawdust Receipts	
EU005	**Chip Handling**	Covered conveyors
EU005a	Chip Production	
EU005b	Chip Receipts	
EU005c	Chip Fines to Hog Fuel (& sawdust fines)	
EU026	**Washing**	
	Base Stock Brownstock Washing	Internal Washer Hood Design
EU026a	No. 3 Base Stock Washer Feed Tank	
EU026b	Base Stock Washer Walkway Exhaust	Thermal Oxidizer
EU026c	No. 1 Base Stock Filtrate Tank	Thermal Oxidizer
EU026d	No. 2 Base Stock Filtrate Tank	Thermal Oxidizer
EU026e	Spill Collection Tank – Base Washers	
	CB Washing	Enclosed System
EU026f	CB Washer Filtrate Tank	
EU026g	CB Washers (M&D System)	
EU026h	M&D Foam Tower	
	PC Washing	Wet Scrubber
EU026i	Foam Tank Vents	
EU026j	Intermediate Foam Tower	
EU026k	PC Washer Vent	
EU026l	PC Washer Stack I	
EU026m	PC Washer Stack II	
	Top Stock Washing	Internal Washer Hood Design
EU026n	Base Stock Reject Tank	
EU026o	Top Stock Foam Tower Tank and Filtrate Tanks	Thermal Oxidizer
EU026p	Top Stock Reject Tank	
EU026q	Top Stock Washer Hood Exhaust	Thermal Oxidizer
EU129	**Bio-Mass Conveying**	None
EU129a	Bio-Mass Conveyor & Pile	
EU129b	Bio-Mass Conveyor to Hog Fuel Boiler	
EU132	**Cyclones**	None
EU132a	M&D Sawdust Cyclone	
EU132b	No. 1 ADS Cyclone	
EU132c	No. 2 ADS Cyclone	
EU132d	No. 3 ADS Cyclone	
EU132e	No. 4 ADS Cyclone	
EU132g	Sawdust Overs Cyclone	
EU132h	Unscreened Sawdust Cyclone	

Emission Unit ID	Description	Pollution Control Device/Practice
EU133	**Micro-Pulsaire Baghouse (Chip Thickness Baghouse)**	None
EU134	**Storage Piles**	
EU134a	Chip Pile Management Raw Chips	Covered Conveyors
EU134c	Sawdust Handling & Storage Emissions	Covered Conveyors
EU134d	Screened Batch Chip Pile	None
EU134e	Screened Kamyr Chip Pile	None
EU134f	Bio-Mass Storage Pile	None
EU134g	Hog Fuel Storage & Handling Emissions	None

	POWER, RECOVERY, AND RECAUSTICIZING DEPARTMENT	
EU002	**No. 4 Recovery Boiler**	ESP
EU003	**No. 5 Recovery Boiler**	ESP
EU011	**No. 1 Lime Kiln**	Wet Venturi Scrubber
EU012	**No. 2 Lime Kiln**	Wet Venturi Scrubber
EU013	**No. 3 Lime Kiln**	Wet Venturi Scrubber
EU014	**No. 4 Lime Kiln**	Wet Venturi Scrubber
EU016	**No. 4 Smelt Dissolving Tank**	Wet Scrubber
EU017	**No. 5 Smelt Dissolving Tank**	Wet Scrubber
EU018	**No. 1 Lime Slaker**	Wet Scrubber
EU019	**No. 2 Lime Slaker**	Wet Scrubber
EU020	**No. 3 Lime Slaker**	Wet Scrubber
EU021	**Multi Fuel Boiler**	Two Parallel Wet Scrubbers
EU024	**No. 1 Power Boiler**	
EU101	**Ash Handling**	
EU039	**Salt Cake/Lime Unloading**	
EU040	**Soda Ash System**	Bin Vent Dust Collector
EU102	**Black Liquor Handling**	None
EU102a	No. 1 Concentrator Boil Out Tank	
EU102b	No. 1 Spill Collection Tank	
EU102c	No. 1 Weak Black Liquor Storage Tank Vent	
EU102d	No. 2 Spill Tank	
EU102e	No. 2 Weak Black Liquor Storage Tank Vent	
EU102h	No. 3 Weak Black Liquor Storage Tank Vent	
EU102i	No. 4 Recovery Boiler Dust Tank	
EU102j	No. 4 Recovery Boiler Mix Tank	
EU102k	No. 4 Weak Black Liquor Storage Tank	
EU102l	No. 5 Recovery Boiler Dust Tank	
EU102m	No. 5 Recovery Boiler Mix Tank	
EU102n	40% Black Liquor Tank Vent (No. 2 Tank)	
EU102o	65% Black Liquor Tank	
EU102p	No. 1 40% Heavy Black Liquor Tank	
EU102q	No. 2 40% Heavy Black Liquor Tank	
EU102r	No. 3 40% Heavy Black Liquor Tank	
EU102s	No. 3 65% Black Liquor Storage Tank	
EU102t	No. 4 65% Black Liquor Tank	
EU109	**Condensate Collection**	
EU109a	No. 1 and N. 2 Evaporators (Foul Condensate)	
EU109b	No. 3 Evaporator (Combined Condensate)	
EU109c	No. 3 Evaporator (Foul Condensate)	
EU109d	No. 4 Evaporator (Condensate from Effect No. 2)	
EU109e	No. 4 Evaporator (Foul Condensate)	
EU109f	No. 2 Condensate/No. 5 Evaporator (Foul Condensate)	

Emission Unit ID	Description	Pollution Control Device/Practice
EU109g	No. 1 Concentrator (Foul Condesate)	
EU109h	Turpentine Decanter	
EU109i	Batch Digester Blow Heat Recovery System (Condensate from Accumulator Secondary Condenser)	
EU109j	LVHC-NCG Line Drains	
EU109k	Foul Condensate Tank	
EU109l	Black Liquor Spill Tank No. 1	
EU110	**Low Volume High Concentration (LVHC) Non-Condensable Gas (NCG)**	Either the Thermal Oxidizer or the #3 Lime Kiln
EU110a	No. 1 and No. 2 Evaporators: Vacuum Vents	
EU110b	No. 3 Evaporator: Vacuum Vents	
EU110c	No. 4 Evaporator: Vacuum Vents	
EU110d	No. 5 Evaporator: Vacuum Vents	
EU110e	No. 2 Concentrator: Hotwell and Vacuum System Vent	
EU110f	No. 1 Concentrator: Hotwell and Vacuum System Vent	
EU110g	M&D Digester: Blow Heat System Vent	
EU110h	Turpentine Condenser Vent	
EU110Ii	No, 1 and No. 2 Evaporators after condenser hotwell vents	
EU110j	No. 3 and No. 4 Evaporator Hotwell Vents	
EU110k	No. 2 Concentrator, No. 5 Evaporator Spiral Condenser Vent, and Hotwell Vent	
EU110l	No.1 Black Liquor Spill Blow Tanks	
EU110m	No. 3 Blow Tank	
EU110n	No. 1 and No.2 Blow Tanks	
EU110o	Foul Condensate Tank	
EU110p	No. 2 Evaporator Auxiliary Surface Condenser and After Condensers Vents	
EU110q	Spill Collection Tank – Weak Black Liquor (Secondary)	
EU119	**Quick Lime/Dry Lime Handling**	
EU119a	Hot Lime Tank No.3 Lime Kiln	
EU119b	Hot Lime Tank Vent No. 4 Lime Kiln	
EU119c	No. 1 Fresh Lime Bin	
EU119d	No. 2 Fresh Lime Bin	
EU119e	No. 3 Fresh Lime Tank Vent	
EU127	**Tall Oil Reactor**	None
EU127a	Tall Oil Reactor	
EU127b	Tall Oil Reactor Scrubber Vent	
EU131	**White Liquor Handling**	None
EU131a	No. 1 Recausticizer Tanks	
EU131b	No. 1 Weak Wash Tank Vent	
EU131c	No. 1 White Liquor Clarifier Tank	
EU131d	No. 1 White Liquor Storage Tank Vent	
EU131e	No. 2 Recausticizer Tank Sets	
EU131f	No. 2 Weak Wash Tank Vent	
EU131g	No .3 Recausticizer Tank Sets	
EU131h	No. 3 White Liquor Clarifier Vents	
EU131i	No. 4 White Liquor Clarifier Vents	
EU131j	No. 3 White Liquor Storage Tank Vent	

Emission Unit ID	Description	Pollution Control Device/Practice
EU153	**Thermal Oxidizer**	Caustic Wet Scrubber
EU153a	Thermal Oxidizer Scrubber Stack	
EU154	**Steam Stripper**	
EU154a	Steam Stripper Vent	
EU154b	Steam Stripper Feed Tank	
EU154c	Steam Stripper-off gas	

	PAPER MILL DEPARTMENT	
EU030	**No. 1 Paper Machine Wet End**	None
EU030a	No. 1 Machine Press Section Area Exhaust	
EU030b	No. 1 Machine Refiner Room Exhaust	
EU030c	No. 1 Machine Wet End Ceiling Exhaust	
EU030d	No. 1 Machine Wet End Room Exhaust	
EU030e	No. 1 Machine Vacuum Pump Sump Exhaust	
EU030f	No. 1 Machine Vac-u-foil Exhausters	
EU031	**No. 1 Paper Machine Dryer**	None
EU031a	No. 1 Machine Dryer Hood Exhaust	
EU032	**No. 2 Paper Machine Wet End**	None
EU032a	No. 2 Machine Wet End False Ceiling Roof Exhaust	
EU032b	No. 2 Machine Flat Box Separator Exhaust Fan	
EU032c	No. 2 Machine Vacuum Pump Sump Exhaust	
EU033	**No. 2 Paper Machine Dryer**	None
EU033a	No. 2 Machine Dryer Hood Exhaust No. 1	
EU033b	No. 2 Machine Dryer Hood Exhaust No. 2	
EU033c	No. 2 Machine Dryer Hood Exhaust No. 3	
EU033d	No. 2 Machine Dryer Hood Exhaust No. 4	
EU033e	No. 2 Machine Dryer Hood Exhaust No. 5	
EU033f	No. 2 Machine Dryer Hood Exhaust No. 6	
EU033g	No. 2 Machine Dryer Hood Exhaust No. 7	
EU034	**No. 3 Paper Machine Wet End**	None
EU034a	No. 3 Machine Press Section Area Roof Exhaust	
EU034b	No. 3 Machine Wet End False Ceiling Exhaust Fans	
EU034c	No. 3 Machine Broke Building Roof Fan	
EU034d	No. 3 Machine Refiner Room Exhaust	
EU034e	No. 3 Machine Vacuum Pump Pit Exhaust	
EU035	**No. 3 Paper Machine Dryer**	None
EU035a	No. 3 Machine Dry End Roof Exhaust	
EU035b	No. 3 Machine Dryer Hood Exhaust – 1st Section	
EU035c	No. 3 Machine Dryer Hood Exhaust – 2nd Section	
EU035d	No. 3 Machine Dryer Hood Exhaust – 3rd Section	
EU035e	No. 3 Machine Dryer Hood Exhaust – 4th Section	
EU035f	No. 3 Machine Dryer Hood Exhaust – 5th Section	
EU035g	No. 3 Machine Dryer Hood Exhaust – 6th Section	
EU035h	No. 3 Machine Dryer Hood Exhaust – 7th Section	
EU037	Starch Handling	Baghouse
EU038	Clay Handling	Baghouse
EU107	**Chemical Storage Tanks**	

Emission Unit ID	Description	Pollution Control Device/Practice
	ENVIRONMENTAL AND TECHNICAL DEPARTMENT	
EU130	**Effluent Treatment System**	None
EU130a	Recaust/Paper Mill Raw Post Consumer Effluent Vent	
EU130b	Sludge Holding Tank	
EU130c	Sludge Press	
EU130d	Sludge Press Building Vent	
EU130e	Sludge Storage Ponds	
EU130f	Primary Clarifier	
EU130g	Aeration Basin No. 1	
EU130h	Aeration Basin No. 2	
EU130i	Aeration Basin No. 3	
EU130j	Treated Effluent Ponds	
EU130k	Polishing Ponds	

	ENGINEERING AND MAINTENANCE DEPARTMENT	
EU120	**Roads, Unpaved**	Reasonable Precautions
EU111	**Liquid Fuel Handling**	Reasonable Precautions
EU152	**CFC Recycling**	

SECTION III. PERMIT CONDITIONS - FACILITY WIDE

The following requirements and conditions are applicable to the facility or to specific emission units located at the facility (ARM 17.8.1211, 1212, and 1213).

A. Facility-Wide General

Conditions	Rule Citation	Rule Description	Pollutant/Parameter	Limit
A.1	ARM 17.8.105	Testing Requirements	Testing Requirements	------
A.2	ARM 17.8.304(1)	Visible Air Contaminants	Opacity	40%
A.3	ARM 17.8.304(2)	Visible Air Contaminants	Opacity	20%
A.4	ARM 17.8.308(1)	Particulate Matter, Airborne	Fugitive Opacity	20%
A.5	ARM 17.8.308(2)	Particulate Matter, Airborne	Reasonable Precautions	-------
A.6	ARM 17.8.308	Particulate Matter, Airborne	Reasonable Precaution, Construction	20%
A.7	ARM 17.8.309	Particulate Matter, Fuel Burning Equipment	Particulate Matter	$E = 0.882 * H^{-0.1664}$ or $E = 1.026 * H^{-0.233}$
A.8	ARM 17.8.310	Particulate Matter, Industrial Processes	Particulate Matter	$E = 4.10 * P^{0.67}$ or $E = 55 * P^{0.11} - 40$
A.9	ARM 17.8.322(4)	Sulfur Oxide Emissions, Sulfur in Fuel	Sulfur in Fuel (liquid or solid fuels)	1 lb/MMBtu fired
A.10	ARM 17.8.322(5)	Sulfur Oxide Emissions, Sulfur in Fuel	Sulfur in Fuel (gaseous)	50 gr/100 CF
A.11	ARM 17.8.324(3)	Hydrocarbon Emissions, Petroleum Products	Gasoline Storage Tanks	-------
A.12	ARM 17.8.324	Hydrocarbon Emissions, Petroleum Products	65,000-Gallon Capacity	-------
A.13	ARM 17.8.324	Hydrocarbon Emissions, Petroleum Products	Oil-effluent Water Separator	-------
A.14	ARM 17.8.342	NESHAPs General Provisions	SSM Plans	Submittal
A.15	ARM 17.8.342	40 CFR 63, Subpart S	National Emission Standards for Hazardous Air Pollutants from the Pulp and Paper Industry	-------
A.16	ARM 17.8.340	40 CFR 60, Subpart D	Standards of Performance for Fossil-Fuel-Fired Steam Generation for Which Construction is Commenced After August 17, 1971.	-------
A.17	ARM 17.8.340	40 CFR 60, Subpart BB	Standards of Performance for Kraft Pulp Mills	-------
A.18	ARM 17.8.342	40 CFR 63 Subpart MM	National Emission Standards for Hazardous Air Pollutants for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mills	-------
A.19	ARM 17.8.749	CEM Data	Recovery Boilers, Limes Kilns, & Multi-fuel Boiler	-------
A.20	State of Montana Air Quality Control Implementation Plan	Missoula County Regulations	Emergency Episode Action Plan	-------
A.21	ARM 17.8.1212	Reporting Requirements	Compliance Monitoring	-------
A.22	ARM 17.8.1207	Reporting Requirements	Annual Certification	-------

Conditions

A.1. Pursuant to ARM 17.8.105, any person or persons responsible for the emission of any air contaminant into the outdoor atmosphere shall, upon written request of the Department, provide the facilities and necessary equipment (including instruments and sensing devices) and shall conduct test, emission or ambient, for such periods of time as may be necessary using methods approved by the Department.

Compliance demonstration frequencies that list "as required by the Department" refer to ARM 17.8.105. In addition, for such sources, compliance with limits and conditions listing "as required by the Department" as the frequency, is verified annually using emission factors and engineering calculations by the Department's compliance inspectors during the annual emission inventory review; in the case of Method 9 tests, compliance is monitored during the regular inspection by the compliance inspector.

A.2. Pursuant to ARM 17.8.304(1), M2Green shall not cause or authorize emissions to be discharged into the outdoor atmosphere from any source installed on or before November 23, 1968, that exhibit an opacity of 40% or greater averaged over 6 consecutive minutes, unless otherwise specified by rule or in this permit.

A.3. Pursuant to ARM 17.8.304(2), M2Green shall not cause or authorize emissions to be discharged into the outdoor atmosphere from any source installed after November 23, 1968, that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes, unless otherwise specified by rule or in this permit.

A.4. Pursuant to ARM 17.8.308(1), M2Green shall not cause or authorize the production, handling, transportation, or storage of any material unless reasonable precautions to control emissions of particulate matter are taken. Such emissions of airborne particulate matter from any stationary source shall not exhibit an opacity of 20% or greater averaged over 6 consecutive minutes, unless otherwise specified by rule or in this permit.

A.5. Pursuant to ARM 17.8.308(2), M2Green shall not cause or authorize the use of any street, road or parking lot without taking reasonable precautions to control emissions of airborne particulate matter, unless otherwise specified by rule or in this permit.

A.6. Pursuant to ARM 17.8.308, M2Green shall not operate a construction site or demolition project unless reasonable precautions are taken to control emissions of airborne particulate matter. Such emissions of airborne particulate matter from any stationary source shall not exhibit an opacity of 20% or greater averaged over 6 consecutive minutes, unless otherwise specified by rule or in this permit.

A.7. Pursuant to ARM 17.8.309, unless otherwise specified by rule or in this permit, M2Green shall not cause or authorize particulate matter caused by the combustion of fuel to be discharged from any stack or chimney into the outdoor atmosphere in excess of the maximum allowable emissions of particulate matter for existing fuel burning equipment and new fuel burning equipment calculated using the following equations:

For existing fuel burning equipment (installed before November 23, 1968):
$E = 0.882 * H^{-0.1664}$

For new fuel burning equipment (installed on or after November 23, 1968):
$E = 1.026 * H^{-0.233}$

Where H is the heat input capacity in million BTU (MMBtu) per hour and E is the maximnm allowable particulate emissions rate in pounds per MMBtu.

A.8. Pursuant to ARM 17.8.310, unless otherwise specified by rule or in this permit, M2Green shall not cause or authorize particulate matter to be discharged from any operation, process, or activity into the outdoor atmosphere in excess of the maximum hourly allowable emissions of particulate matter calculated using the following equations:

For process weight rates up to 30 tons per hour: $E = 4.10 * P^{0.67}$
For process weight rates in excess of 30 tons per hour: $E = 55.0 * P^{0.11} - 40$

Where E is the rate of emissions in pounds per hour and P is the process weight rate in tons per hour.

A.9. Pursuant to ARM 17.8.322(4), M2Green shall not burn liquid or solid fuels containing sulfur in excess of 1 pound per million BTU fired, unless otherwise specified by rule or in this permit.

A.10. Pursuant to ARM 17.8.322(5), M2Green shall not burn any gaseous fuel containing sulfur compounds in excess of 50 grains per 100 cubic feet of gaseous fuel, calculated as hydrogen sulfide at standard conditions, unless otherwise specified by rule or in this permit.

A.11. Pursuant to ARM 17.8.324(3), M2Green shall not load or permit the loading of gasoline into any stationary tank with a capacity of 250 gallons or more from any tank truck or trailer, except through a permanent submerged fill pipe, unless such tank is equipped with a vapor loss control device or is a pressure tank as described in ARM 17.8.324(1), unless otherwise specified by rule or in this permit.

A.12. Pursuant to ARM 17.8.324, unless otherwise specified by rule or in this permit, M2Green shall not place, store or hold in any stationary tank, reservoir or other container of more than 65,000-gallon capacity any crude oil, gasoline or petroleum distillate having a vapor pressure of 2.5 pounds per square inch absolute or greater under actual storage conditions, unless such tank, reservoir or other container is a pressure tank maintaining working pressure sufficient at all times to prevent hydrocarbon vapor or gas loss to the atmosphere, or is designed and equipped with a vapor loss control device, properly installed, in good working order and in operation.

A.13. Pursuant to ARM 17.8.324, unless otherwise specified by rule or in this permit, M2Green shall not use any compartment of any single or multiple-compartment oil-effluent water separator, which compartment receives effluent water containing 200 gallons a day or more of any petroleum product from any equipment processing, refining, treating, storing or handling kerosene or other petroleum product of equal or greater volatility than kerosene, unless such compartment is equipped with a vapor loss control device, constructed so as to prevent emission of hydrocarbon vapors to the atmosphere, properly installed, in good working order and in operation.

A.14. Pursuant to ARM 17.8.342 and 40 CFR 63.6, M2Green shall submit to the Department a copy of any startup, shutdown, and malfunction (SSM) plan required under 40 CFR 63.6(e)(3) within 30 days of the effective date of this operating permit (if not previously submitted), within 30 days of the compliance date of any new National Emission Standard for Hazardous Air Pollutants (NESHAPs) or Maximum Achievable Control Technology (MACT) standard, and within 30 days of the revision of any such SSM plan, when applicable. The Department requests submittal of such plans in electronic form, when possible.

A.15. Pursuant to ARM 17.8.342 and 40 CFR 63, Subpart S, M2Green shall comply with all applicable standards and limitations, and the reporting, recordkeeping, and notification requirements as required by 40 CFR 63, Subpart S – National Emission Standards for Hazardous Air Pollutants from the Pulp and Paper Industry. The requirements include, but are not limited to, the following:

a. The pulping process condensates from the listed equipment systems that in total contain a total Hazardous Air Pollutant (HAP) mass of 3.6 kilograms or more of total HAP (measured as methanol) per megagram (7.2 pounds per ton) of oven-dried pulp (ODP) for mills that do not perform bleaching (40 CFR 63.446(c)(3)).

b. Treat the pulping process condensates to remove methanol by recycling collected condensates specified in Section V.H (EU109) to systems, including the evaporator system, equipped with vent control or by removal in the steam stripper of at least 92 percent (by weight) of methanol per oven-dried ton pulp criteria (40 CFR 63.446(e)(3)).

c. Reduce total HAP emissions using a thermal oxidizer designed and operated at a minimum temperature of 871°C (1600°F) and a minimum residence time of 0.75 seconds (40 CFR 63.443(d)(3)).

d. Monitor the specified units in accordance with §63.453(k) and (n).

e. Maintain and operate in accordance to the SSM Plan.

f. Comply with the requirements of §63.8 including the requirements for a Quality Control Plan.

A.16. Pursuant to ARM 17.8.340 and 40 CFR 60, Subpart D, M2Green shall comply with all applicable standards and limitations, and the reporting, recordkeeping, and notification requirements as required by 40 CFR 60, Subpart D-Standards of Performance for Fossil-Fuel-Fired Steam Generation for Which Construction is Commenced After August 17, 1971.

A.17. Pursuant to ARM 17.8.340 and 40 CFR 60, Subpart BB, M2Green shall comply with all applicable standards and limitations, and the reporting, recordkeeping, and notification requirements as required by 40 CFR 60, Subpart BB-Standards of Performance for Kraft Pulp Mills.

A.18. Pursuant to ARM 17.8.342 and 40 CFR 63, Subpart MM, M2Green shall comply with all applicable standards and limitations, and the reporting, recordkeeping, and notification requirements as required by 40 CFR 63, Subpart MM-National Emission Standards for Hazardous Air Pollutants for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mills.

A.19. Failure to report CEM data required by Section V.A, B, E and G, which is not available because of monitor downtime or insufficient quality assurance, shall not be considered a violation of the reporting requirements of this section. However, the unavailability of such data may be violation of the monitoring requirements of Section V.A, B, E and G (ARM 17.8.749).

A.20. M2Green shall comply with the requirements contained in Chapter 4 of the Missoula City-County Air Pollution Control Program (Chapter 32 of the State of Montana Air Quality Control Implementation Plan) with regards to emergency episodes.

A.21. On or before February 15 and August 15 of each year, M2Green shall submit to the Department the compliance monitoring reports required by Section VIII.D. These reports must contain all information required by Section VIII.D, as well as the information required by each individual emission unit. For the reports due by February 15 of each year, M2Green may submit a single report, provided that it contains all the information required by Section VIII.B & VIII.D. Per ARM 17.8.1207,

any application form, report, or compliance certification submitted pursuant to ARM Title 17, Chapter 8, Subchapter 12 (including semiannual monitoring reports), shall contain certification by a responsible official of truth, accuracy and completeness. This certification and any other certification required under ARM Title 17, Chapter 8, Subchapter 12, shall state that, ***"based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete."***

A.22. By February 15 of each year, M2Green shall submit to the Department the compliance certification report required by Section VIII.B. The annual certification report required by Section VIII.B must include a statement of compliance based on the information available that identifies any observed, documented or otherwise known instance of noncompliance for each applicable requirement. Per ARM 17.8.1207,

any application form, report, or compliance certification submitted pursuant to ARM Title 17, Chapter 8, Subchapter 12 (including annual certifications), shall contain certification by a responsible official of truth, accuracy and completeness. This certification and any other certification required under ARM Title 17, Chapter 8, Subchapter 12, shall state that, ***"based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete."***

B. Mill-Wide Permit Conditions

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration Method	Compliance Demonstration Frequency	Reporting Requirements
B.1, B.4, B.7, B.9, B.11, B.12, B.13	SO_2 Facility Wide	5,000 lb/day	Calculate SO_2 Source Emission	Daily	Monthly
B.2, B.5, B.8, B.11, B.12, B.13	Wood Pulp Production Facility Wide	535,000 ODT per rolling 12-month period	Calculate wood pulp production	Daily	Monthly
B.3, B.6, B.10, B.12, B.13	H_2S	Ambient Air Monitoring (State-Only)	Appendix F	Appendix F	Appendix F

Conditions

B.1. Total sulfur dioxide (SO_2) emissions from the mill shall not exceed 5,000 lb/day (ARM 17.8.1201(10)).

B.2 Total wood pulp production shall not exceed 535,000 oven-dry tons (ODT) per rolling 12-month period (ARM 17.8.749).

B.3. M2Green shall conduct an ambient air monitoring program consisting of the following in accordance with Appendix F of this permit (ARM 17.8.204, State-Only Requirement).

a. At least two analyzers to measure hydrogen sulfide (H_2S).

b. At least one wind system.

c. Sampling sites, data reporting, and parameters to be monitored will be specified by the Department.

Compliance Demonstration

B.4. M2Green shall calculate the daily SO_2 emissions from the mill in pounds per day to monitor compliance with Section III.B.1 (ARM 17.8.1213).

B.5. M2Green shall calculate the total wood pulp production based on a mill day using the following methodology (equations a-c) to monitor compliance with Section III.B.2 (ARM 17.8.749):

a. Fiber usage on machines (tons, as produced) = Paper machine production (tons, as produced) +/- change in Cull production inventory (tons, as produced)

b. Fiber usage on machines (oven-dry tons) = Fiber usage on machines (tons, as produced) x (1.0 – moisture content of paper – chemical additive content of the linerboard)

c. Wood pulp production (ODT) = Fiber usage on machines (ODT) – OCC usage on machines (ODT) +/- Wood pulp high density storage change (ODT).

B.6. M2Green shall operate and maintain the ambient air monitoring program in accordance with Appendix F of this permit to monitor compliance with Section III.B.3 (ARM 17.8.204, State-Only Requirement).

Recordkeeping

B.7. M2Green shall maintain, on site, the record of the daily SO_2 emissions (in pounds per day) from the facility (ARM 17.8.1212).

B.8. M2Green shall maintain, on site, the record of the daily wood pulp production from the facility (ARM 17.8.1212).

B.9. In the event of a total natural gas curtailment, M2Green shall report, in addition to the reports required by in this permit, the following (ARM 17.8.1201(10)):

a. Daily SO_2 emissions from recovery boilers and power boilers.

b. Dates and times of curtailment.

c. Quantity and sulfur content of fuel oil burned.

d. All fuel oil burned must comply with ARM 17.8.322 – Sulfur In Fuel Oil rule, unless sulfur dioxide emissions are controlled on an equivalent basis.

B.10. M2Green shall maintain records in accordance with Appendix F of this permit (ARM 17.8.204, State-Only Requirement).

Reporting

B.11. M2Green shall submit a monthly report to the Department within 30 days following the end of the month. The report shall include (ARM 17.8.1212):

a. The average daily pulp production in air-dried tons of pulp per day and oven-dry tons of pulp per day; and

b. The highest daily SO_2 emissions value for the month.

B.12. The semiannual monitoring report shall contain the monthly total pulp production and the highest 12-month rolling total pulp production and the highest daily total mill-wide SO_2 emissions during the period, with all instances of deviations from any permit requirements identified (ARM 17.8.1212).

B.13. The annual compliance certification report required by Section VIII.B must contain a certification statement for the above applicable requirements (ARM 17.8.1212).

SECTION IV. PERMIT CONDITIONS - PULP, CHIP DOCK AND RECYCLED FIBER DEPARTMENT

A. Sawdust Handling, Chip Handling, Bio-Mass Conveying, Hog Fnel Handling

EU004 – Sawdust Handling
EU004a – Sawdust Fines to Hog Fuel (& chip screening fines)
EU004b – Sawdust Receipts
EU005 – Chip Handling
EU005a – Chip Production
EU134g – Hog Fuel Storage and Handling Emissions
EU129 – Bio-Mass Conveying
EU129a – Bio-Mass Conveyor & Pile
EU129b – Bio-Mass Conveyor to Hog Fuel Boiler
EU134f – Bio Mass Storage Pile
EU005b – Chip Receipts
EU005c – Chip Fines to Hog Fuel (& sawdust fines)

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration Method	Compliance Demonstration Frequency	Reporting Requirements
A.1, A.13, A.14, A.20, A.23, A.24, A.25	Opacity	20%	Method 9	As Required by the Department and Section III.A.1	Semi-annual
			No. 1, 2, and 3 Truck Dump Usage	Ongoing	Semi-annual
A.2, A.15, A.20, A.24, A.25	Sawdust Conveyors	Control Fugitives	Hood & Skirt w/ Max Drop Height of 10 ft	Ongoing	Semi-annual
A.3, A.16, A.17, A.22, A.23, A.24, A.25	Sawdust Handled PM PM_{10}	(w/ 25% control) 0.75 lb/ton 0.27 lb/ton	Calculations w/ Established Equations	As Required by the Department and Section III.A.1	Semi-annual
A.4, A.17, A.23, A.24, A.25	Chips Handled PM PM_{10}	 0.18 lb/ton 0.065 lb/ton	Method 9	Quarterly	Semi-annual
A.5, A.17, A.23, A.24, A.25	Hog Fuel Handled PM PM_{10}	 1.0 lb/ton 0.36 lb/ton			
A.6, A.17, A.23, A.24, A.25	Fines – Chip Screen Handled PM PM_{10}	 0.27 lb/ton 0.09 lb/ton			
A.7, A.17, A.23, A.24, A.25	Fines – Sawdust Screen Handled PM PM_{10}	 0.75 lb/ton 0.27 lb/ton			
A.8, A.17, A.23, A.24, A.25	Screened Chips to Kamyr Pile PM PM_{10}	 0.045 lb/ton 0.001 lb/ton			
A.9, A.17, A.23, A.24, A.25	Screened Chips to Batch Pile PM PM_{10}	 0.045 lb/ton 0.001 lb/ton			
A.10, A.17, A.23, A.24, A.25	Screened Sawdust Overs to Chip Pile PM PM_{10}	 0.09 lb/ton 0.005 lb/ton			
A.11, A.18, A.21, A.24, A.25	Chip Screen & Sawdust Screen Fines to Hog Fuel Pile	Operation of Target Plate and Bunker to Control Fugitives	Recordkeeping	As Necessary	Semi-annual
A.12, A.19, A.20, A.24, A.25	Quantity of Sawdust Overs	Weightometer on Sawdust Overs Belt	Maintain & Operate	Operate During Belt Operations	Semi-annual

Conditions

A.1. M2Green shall not cause or authorize emissions from the chip and sawdust handling, truck dumping, storage bin and the storage bin unloading system to be discharged into the outdoor atmosphere that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.304 and ARM 17.8.308).

A.2. The sawdust conveyor(s) shall be controlled by a hood and skirt at the end of the conveyor to limit the free drop height (the distance from the bottom of the skirt to the sawdust pile) to a maximum of 10 feet (ARM 17.8.1201(10)).

A.3. M2Green shall be limited to 0.75 lb/ton of sawdust handled for total particulate and 0.27 lb/ton of sawdust handled for PM_{10} (SCC #3-07-008-03) with hood and skirt controls at 25% (ARM 17.8.1201(10)).

a. The total sawdust pile emissions shall be calculated as: TSP (total tons) = {(Qty Sawdust overs)*(0.18*[1-0.25])/2000+(Qty Sawdust receipts-Qty Sawdust overs)*(1.0*[1-0.25])/2000}.

b. The total sawdust pile emissions shall be calculated as: PM_{10} (total tons) = {(Qty Sawdust overs)*(0.065*[1-0.25])/2000+(Qty Sawdust receipts-Qty Sawdust overs)*(0.36*[1-0.25])/2000}.

c. M2Green shall ensure that the 10-foot maximum distance is met at all times. When the material under the belt is reclaimed, M2Green shall shut down the conveyor, remove the material, and fill in the void with new material before restarting the conveyor to ensure the 10-foot maximum distance is met.

A.4. M2Green shall be limited to 0.18 lb/ton of chips handled for total particulate and 0.065 lb/ton of chips handled for PM_{10} (State emission estimate) (ARM 17.8.1201(10)).

A.5. M2Green shall be limited to 1.0 lb/ton of hog fuel handled for total particulate and 0.36 lb/ton of hog fuel handled for PM_{10} (SCC #3-07-008-03) (ARM 17.8.1201(10)).

A.6. M2Green shall be limited to 0.27 lb/ton (controlled) of fines sent to hog fuel from chip screen handled for total particulate and 0.09 lb/ton (controlled) of fines sent to hog fuel from chip screen handled for PM_{10} (M2Green emission estimate) (ARM 17.8.1201(10)).

A.7. M2Green shall be limited to 0.75 lb/ton (controlled) of fines sent to hog fuel from sawdust screen handled for total particulate and 0.27 lb/ton (controlled) of fines sent to hog fuel from sawdust screen handled for PM_{10} (M2Green emission estimate) (ARM 17.8.1201(10)).

A.8. M2Green shall be limited to 0.045 lb/ton of screened chips to Kamyr pile handled for total particulate and 0.001 lb/ton of screened chips to Kamyr pile handled for PM_{10} (M2Green emission estimate) (ARM 17.8.1201(10)).

A.9. M2Green shall be limited to 0.045 lb/ton of screened chips to batch pile handled for total particulate and 0.001 lb/ton of screened chips to batch pile handled for PM_{10} (M2Green emission estimate) (ARM 17.8.1201(10)).

A.10. M2Green shall be limited to 0.09 lb/ton of screened sawdust overs to chip pile handled for total particulate and 0.005 lb/ton of screened sawdust overs to chip pile handled for PM_{10} (M2Green emission estimate) (ARM 17.8.1201(10)).

A.11. Emissions from the fines from the chip screen and sawdust screen being sent by the pneumatic conveying system to the hog fuel pile shall be controlled by a target plate and bunker at the end of the discharge pile (ARM 17.8.1201(10)).

A.12. M2Green shall maintain a weightometer on the sawdust overs belt to be used to determine the quantity of sawdust overs handled (ARM 17.8.1201(10)).

Compliance Demonstration

A.13. As required by the Department and Section III.A.1, M2Green shall perform a Method 9 test in accordance with the Montana Source Test Protocol and Procedures Manual to monitor compliance with Section IV.A.1. Each observation period shall be a minimum of 6 minutes unless any one reading is 20% or greater; then the observation period shall be a minimum of 20 minutes or until a violation of the standard has been documented, which ever is a shorter period of time (ARM 17.8.105 and ARM 17.8.1213).

A.14. Monitoring compliance with the opacity requirements contained in Section IV.A.1 for truck dumping includes maintaining the proper use of dump areas (ARM 17.8.1201(10)).

a. The #1 Dump is used to unload trucks only and uses a belt system to convey chips and sawdust to the stockpiles.

b. The #2 Dump is used to unload trucks only and uses a conveyor belt to convey chips to the stockpiles.

c. The #3 Dump is a combination truck or rail dump that conveys chips and sawdust using a belt system to the stockpiles.

A.15. A mechanism to allow for an inspector to measure the drop height must be provided at all times when sawdust is being processed to demonstrate compliance with Section IV.A.2 (ARM 17.8.749 and ARM 17.8.1201(10)).

A.16. M2Green shall use the equations contained in Section IV.A.3.a and b to monitor compliance with the limitations in Section IV.A.3 at any time (ARM 17.8.749 and ARM 17.8.1213).

A.17. Quarterly, M2Green shall perform Method 9 testing in accordance with the Montana Source Test Protocol and Procedures Manual to monitor compliance with Section IV.A.3 through IV.A.10. Each observation period shall be a minimum of 6 minutes unless any one reading is 20% or greater; then the observation period shall be a minimum of 20 minutes or until a violation of the standard has been documented, which ever is a shorter period of time (ARM 17.8.105 and ARM 17.8.1213).

A.18. M2Green shall document any modifications to the target plate and bunker at the end of the discharge pile that have been used as emissions control to monitor compliance with Section IV.A.11 (ARM 17.8.1213).

A.19. M2Green shall use a weightometer on the sawdust overs belt, when the belt is operating, to determine the quantity of sawdust overs handled to monitor compliance with Section IV.A.12 (ARM 17.8.1213).

Recordkeeping

A.20. M2Green shall maintain records on site documenting all instances when the requirements of Sections IV.A.14, A.15, and A.19 are not met. These records shall be submitted to the Department upon request (ARM 17.8.1212).

A.21. M2Green shall maintain the records required by Section IV.A.18 on site and submit the information to the Department upon request (ARM 17.8.1212).

A.22. M2Green shall maintain, on site, records of the quantity of sawdust overs and sawdust receipts and submit calculations to the Department upon request (ARM 17.8.1212).

A.23. All source test recordkeeping shall be performed in accordance with the test method used, and shall be maintained on site. The reports must be submitted to the Department in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106 and ARM 17.8.1212).

Reporting

A.24. The semiannual monitoring report shall provide a summary of results of the last source testing that was performed (ARM 17.8.1212):

A.25. The annual compliance certification report required by Section VIII.B must contain a certification statement for the above applicable requirements (ARM 17.8.1212).

B. Washing

EU026 - Washing

Base Stock (Brown Stock) Washing
EU026a – No. 3 Base Stock Washer Feed Tank
EU026b – Base Stock Washer Walkway Exhaust
EU026c – No. 1 Base Stock Filtrate Tank
EU026d – No.2 Base Stock Filtrate Tank
EU026e – Spill Collection Tank – Base Washers

CB Washing (M&D Washing)
EU026f – CB Washer Filtrate Tank
EU026g – CB Washers (M&D System)
EU026 h – M&D Foam Tower

PC Washing
EU026i – Foam Vent Tanks
EU026j – Intermediate Foam Tower

EU026k – PC Washer Vent
EU026l – PC Washer Stack I
EU026m – PC Washer Stack II

Top Stock Washing
EU026n - Base Stock Reject Tank
EU026o – Top Stock Foam Tower Tank and Filtrate Tank
EU026p – Top Stock Reject Tank
EU026q – Top Stock Washer Hood Exhaust

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration Method	Compliance Demonstration Frequency	Reporting Requirements
B.1, B.3, B.5, B.6, B.7	Particulate emissions from #1 Base Washer, #2 Base Washer, and the Top Washer	Control by internal washer hood design	Recordkeeping	Monthly	Semi-annual
B.2, B.4, B.5, B.6, B.7	HAP emissions from brown stock washers, filtrate tanks, and foam tower	Collect & route to Thermal Oxidizer	Verify vacuum is maintained, pressure does not exceed set pressure points, and Booster Fan vent valve is closed	Ongoing	Semi-annual (in MACT I Excess Emissions and Continuous Monitoring System Performance and Summary Report)

Conditions

B.1. Particulate emissions from the #1 Base Washer, #2 Base Washer, and the Top Washer shall be controlled by internal washer hood design (ARM 17.8.1201(10)).

B.2. HAP emissions from the brown stock washers, filtrate tanks, and foam tower shall be collected with a closed vent system and routed to the existing Thermal Oxidizer (ARM 17.8.342 and 40 CFR 63, Subpart S).

Compliance Demonstration

B.3. M2Green shall monitor compliance with Section IV.B.1 by documenting any maintenance or repair activities affecting washer hood design and particulate removal capability. The records must include, but are not limited to, the date, time, and action(s) taken for repair and maintenance (ARM 17.8.1213).

B.4. M2Green shall verify compliance with Section IV.B.2 by monitoring the following on a 15-minute basis during operation of the washers to verify proper operation of the HAP collection system (ARM 17.8.1213):

a. Verify washer hood pressure does not exceed the Department-approved pre-determined venting setpoint;

b. Verify filtrate tank and foam tower pressure does not exceed the Department-approved pre-determined venting setpoint; and

c. Verify the HVLC-NCG Booster Fan vent valve is closed.

Recordkeeping

B.5. M2Green shall maintain, on site, records of the monitoring required in Sections IV.B.3 and B.4 above (ARM 17.8.1212).

Reporting

B.6. The semiannual monitoring report shall provide a summary of any maintenance or repair activities affecting washer hood design and particulate removal (ARM 17.8.1212).

B.7. The annual compliance certification report required by Section VIII.B must contain a certification statement for the above applicable requirements (ARM 17.8.1212).

C. Cyclones

EU132 - Cyclones
EU132a – M&D Sawdust Cyclone
EU132b – No. 1 ADS Cyclone
EU132c – No. 2 ADS Cyclone
EU132d – No. 3 ADS Cyclone
EU132e – No. 4 ADS Cyclone
EU132g – Sawdust Overs Cyclone
EU132h – Unscreened Sawdust Cyclone

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration Method	Compliance Demonstration Frequency	Reporting Requirements
C.1, C.9, C.12, C.14, C.15	Opacity M&D Sawdust Cyclone, No. 1 ADS Cyclone, No. 2 ADS Cyclone, No. 3 ADS Cyclone, No. 4 ADS Cyclone, Sawdust Overs Cyclone, Uuscreened Sawdust Cyclone	20%	Method 9	As Required by the Department and Section III.A.1	Semi-annual
C.2, C.10, C.12, C.14, C.15	M&D Cyclone TSP	60 lb/day 2.5 lb/hr	40 CFR 60, App. A 40 CFR 51, App.M	As Required by the Department and Section III.A.1	Semi-annual
C.3, C.10, C.12, C.14, C.15	M&D Cyclone PM_{10}	24 lb/day 1.0 lb/hr			
C.4, C.10, C.12, C.14, C.15	ADS Slicers and Cyclones TSP	26.4 lb/day 1.10 lb/hr			
C.5, C.10, C.12, C.14, C.15	ADS Slicers and Cyclones PM_{10}	26.4 lb/day 1.1 lb/hr			
C.6, C.10, C.12, C.14, C.15	Sawdust Overs Cyclone TSP	26.4 lb/day 1.1 lb/hr			
C.7, C.10, C.12, C.14, C.15	Sawdust Overs Cyclone PM_{10}	26.4 lb/day 1.1 lb/hr			
C.8, C.11, C.13, C.14, C.15	All Cyclones	Each Limited to 8,544 hr During Any 12-Month Rolling Period	Maintain a Log	Monthly Calculations	Semi-annual

Conditions

C.1. M2Green shall not cause or authorize emissions to be discharged into the outdoor atmosphere from the M&D Sawdust Cyclone, No. 1 ADS Cyclone, No. 2 ADS Cyclone, No. 3 ADS Cyclone, No. 4 ADS Cyclone, Sawdust Overs Cyclone and the Unscreened Sawdust Cyclone that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.304(2)).

C.2. Total suspended particulate emissions from the M&D Cyclone shall be limited to 60 pounds per day (lb/day) and 2.5 pounds per hour (lb/hr) (ARM 17.8.1201(10)).

C.3. PM_{10} emissions from the M&D Cyclone shall be limited to 24 lb/day and 1.0 lb/hr (ARM 17.8.1201(10)).

C.4. Total suspended particulate emissions from the ADS Slicers and Cyclones shall not exceed 26.4 lb/day and 1.10 lb/hr for each cyclone (ARM 17.8.1201(10)).

C.5. PM_{10} emissions from the ADS Slicers and Cyclones shall not exceed 26.4 lb/day and 1.1 lb/hr for each cyclone (ARM 17.8.1201(10)).

C.6. Total suspended particulate emissions from the Sawdust Overs Cyclone shall not exceed 26.4 lb/day and 1.1 lb/hr for each cyclone (ARM 17.8.1201(10)).

C.7. PM_{10} emissions from the Sawdust Overs Cyclone shall not exceed 26.4 lb/day and 1.1 lb/hr for each cyclone (ARM 17.8.1201(10)).

C.8. The M&D Cyclone, ADS Slicers and Cyclones, and the Sawdust Overs Cyclone shall each not be operated more than 8,544 hours during any 12-month rolling period (ARM 17.8.1201(10)).

Compliance Demonstration

C.9. As required by the Department and Section III.A.1, M2Green shall perform a Method 9 test in accordance with the Montana Source Test Protocol and Procedures Manual to monitor compliance with Section IV.C.1. Each observation period shall be a minimum of 6 minutes unless any one reading is 20% or greater; then the observation period shall be a minimum of 20 minutes or until a violation of the standard has been documented, which ever is a shorter period of time (ARM 17.8.105 and ARM 17.8.1213).

C.10. As required by the Department and Section III.A.1, monitoring compliance with Section IV.C.2 through C.7 above shall be accomplished by EPA source sampling methods specified in 40 CFR Part 60, Appendix A. PM_{10} sampling methods are specified by 40 CFR Part 51, Appendix M. Total particulate results may be used as a surrogate for PM_{10} if the impinger analysis ("back-half") is included (ARM 17.8.105 and ARM 17.8.1213).

C.11. M2Green shall document, by month, the total hours of operation of each of the cyclones and slicers listed in Section IV.C.8. By the 25th day of each month, M2Green shall total the hours of operation of the cyclones and slicers for the previous month. The monthly information will be used to verify compliance with the rolling 12-month limitation in Section IV.C.8 (ARM 17.8.1213).

Recordkeeping

C.12. All compliance source test recordkeeping shall be performed in accordance with the test method used, and shall be maintained on site. The reports must be submitted to the Department in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106 and ARM 17.8.1212).

C.13. The log of operational hours as required by Section IV.C.8 shall be maintained on site and submitted to the Department upon request (ARM 17.8.1212).

Reporting

C.14. The semiannual monitoring report shall provide (ARM 17.8.1212):

a. A summary of results of the last source testing that was performed; and

b. A summary of the log of operational hours.

C.15. The annual compliance certification report required by Section VIII.B must contain a certification statement for the above applicable requirements (ARM 17.8.1212).

D. Micro-Pulsaire Baghouse

EU133 – Micro-Pulsaire Baghouse – Chip Thickness Baghouse

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration Method	Compliance Demonstration Frequency	Reporting Requirements
D.1, D.4, D.6, D.7, D.8	Opacity	20%	Method 9	As Required by the Department and Section III.A.1	Semi-annual
D.2, D.3, D.5, D.6, D.7, D.8	Baghouse TSP & PM_{10}	22.8 lb/day 0.95 lb/hr	40 CFR 60 App. A 40 CFR 51 App.M	Annually	Semi-annual

Conditions

D.1. M2Green shall not cause or authorize emissions to be discharged into the outdoor atmosphere from the Micro-Pulsaire Baghouse that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.304(2)).

D.2. Total suspended particulate emissions from this baghouse shall be limited to 22.8 lb/day and 0.95 lb/hr (ARM 17.8.1201(10)).

D.3. PM_{10} emissions from this baghouse shall be limited to 22.8 lb/day and 0.95 lb/hr (ARM 17.8.1201(10)).

Compliance Demonstration

D.4. As required by the Department and Section III.A.1, M2Green shall perform a Method 9 test in accordance with the Montana Source Test Protocol and Procedures Manual to monitor compliance with Section IV.D.1. Each observation period shall be a minimum of 6 minutes unless any one reading is 20% or greater; then the observation period shall be a minimum of 20 minutes or until a violation of the standard has been documented, which ever is a shorter period of time (ARM 17.8.105 and ARM 17.8.1213).

D.5. Annually, monitoring compliance with Section IV.D.2 and 3 shall be accomplished by EPA source sampling methods specified in 40 CFR Part 60, Appendix A. PM_{10} sampling methods are specified by 40 CFR Part 51, Appendix M. Total particulate results may be used as a surrogate for PM_{10} if the impinger analysis ("back-half") is included (ARM 17.8.1213).

Recordkeeping

D.6. All compliance source test recordkeeping shall be performed in accordance with the test method used, and shall be maintained on site. The reports must be submitted to the Department in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106 and ARM 17.8.1212).

Reporting

D.7. The semiannual reporting shall provide a summary of results of the last source testing that was performed (ARM 17.8.1212).

D.8. The annual compliance certification report required by Section VIII.B must contain a certification statement for the above applicable requirements (ARM 17.8.1212).

E. Storage Piles

EU134 – Storage Piles
EU134a – Chip Pile Management Raw Chips
EU134c – Sawdust Handling & Storage Emissions
EU134d – Screened Batch Chip Pile
EU134e – Screened Kamyr Chip Pile

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration		Reporting Requirements
			Method	Frequency	
E.1, E.2, E.3, E.4, E.5	Opacity	20%	Method 9	As Required by the Department and Section III.A.1	Semi-annual

Conditions

E.1. M2Green shall not cause or authorize the production, handling, transportation, or storage of any material unless reasonable precautions to control emissions of particulate matter are taken. Such emissions of airborne particulate matter from EU134(a-e) Storage Piles shall not exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.308(1)).

Compliance Demonstration

E.2. As required by the Department and Section III.A.1, M2Green shall perform a Method 9 test in accordance with the Montana Source Test Protocol and Procedures Manual. Each observation period shall be a minimum of 6 minutes unless any one reading is 20% or greater; then the observation period shall be a minimum of 20 minutes or until a violation of the standard has been documented, which ever is a shorter period of time (ARM 17.8.105 and ARM 17.8.1213).

Recordkeeping

E.3. All compliance source test recordkeeping shall be performed in accordance with the test method used, and shall be maintained on site. The reports must be submitted to the Department in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106 and ARM 17.8.1212).

Reporting

E.4. The semiannual monitoring report shall provide a summary of results of the last source testing that was performed (ARM 17.8.1212).

E.5. The annual compliance certification report required by Section VIII.B must contain a certification statement for the above applicable requirements (ARM 17.8.1212).

SECTION V. PERMIT CONDITIONS - POWER, RECOVERY, AND RECAUSTICIZING DEPARTMENT

A. No. 4 Recovery Boiler

EU002 – No. 4 Recovery Boiler

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration Method	Compliance Demonstration Frequency	Reporting Requirements
A.1, A.13, A.24, A.33, A.36	Black Liquor Firing Rate	Daily Rate	Maintain Log	Daily	Monthly
A.2, A.14, A.25, A.35, A36	TSP	0.044 gr/dscf corrected to 8% O_2 and 1,253 lb/day 52.21 lb/hr	40 CFR Part 60, Appendix A	Annually, Semi-annual if above 80% of permit limit	Semi-annual
A.3, A.14, A.25, A.35, A.36	PM_{10}	1,253 lb/day 52.21 lb/hr	40 CFR Part 51, Appendix M	Annually, Semi-annual if above 80% of permit limit	Semi-annual
A.4, A.14, A.25, A.35, A.36	Total Sulfate	1,253 lb/day 52.21 lb/hr	40 CFR Part 60, Appendix A	Annually	Semi-annual
A.5, A.15, A.16, A.25, A.33, A.35, A.36	Total Reduced Sulfur	≤ 5 ppm, 24-hr Average	40 CFR Part 60, Appendix A	Every Two Years	Monthly
			CEM	24-hr Avg	
A.6, A.16, A.27, A.35, A.36	Total Reduced Sulfur	CEM	Operate and Maintain	Ongoing	Semi-annual
A.7, A.17, A.18, A.26, A.28, A.33, A.36	TSP	928 lb/Day – Monthly Average	COM Data & Correlation Equations	Monthly	Monthly
A.8, A.19, A.29, A.35, A.36	Correlation Equations	Proposed Changes	Request Department Approval	As Necessary	Semi-annual
A.9, A.18, A.20, A.26, A.34, A.36	Opacity	20%	COM	Ongoing	Monthly
A.10, A.21, A.30, A.34, A.35, A.36	Opacity	COM	Operate and Maintain	Ongoing	Semi-annual
			EER Reports	As Necessary	Quarterly
A.11, A.22, A.31, A.35, A.36	Particulate Emissions	Operate and Maintain ESP	Recordkeeping	As Necessary	Semi-annual
A.12, A.23, A.32, A.35, A.36	CAM Plan	CAM Plan Appendix E	CAM Plan Appendix E	Ongoing	Semi-annual

Conditions

A.1. M2Green shall report, monthly, the daily black liquor firing rate for the No. 4 Recovery Boiler (ARM 17.8.749).

A.2. Total suspended particulate emissions from the No. 4 Recovery Boiler shall not exceed 0.044 grains per dry standard cubic foot (gr/dscf) corrected to 8% Oxygen (O_2) concentration (ARM 17.8.342 and 40 CFR 63, Subpart MM) and in no case shall exceed 1,253 lb/day and 52.21 lb/hr (ARM 17.8.1201(10)).

A.3. PM_{10} emissions from the No. 4 Recovery Boiler shall not exceed 1,253 lb/day and 52.21 lb/hr (ARM 17.8.1201(10)).

A.4. Total sulfate emissions from the No. 4 Recovery Boiler shall not exceed 1,253 lb/day and 52.21 lb/hr (ARM 17.8.1201(10)).

A.5. Total reduced sulfur (TRS) emissions from the No. 4 Recovery Boiler shall not exceed 5 parts per million (ppm), 24-hour average (ARM 17.8.1201(10)).

A.6. A continuous emission monitor for TRS compounds is required by state permit for this source (ARM 17.8.749 and ARM 17.8.1201(10)).

A.7. The monthly average total suspended particulate for the No. 4 Recovery Boiler shall not exceed 928 lb/day (ARM 17.8.749 and ARM 17.8.1201(10)).

A.8. M2Green shall submit for approval to the Department any proposed changes to the correlation equations used to determine particulate mass emissions (ARM 17.8.1201(10)).

A.9. M2Green shall not discharge into the outdoor atmosphere emissions from the No. 4 Recovery Boiler that exhibit 20% opacity or greater averaged over 6 consecutive minutes for more than 6% of the 6-minute time periods during which the No. 4 Recovery Boiler is operating within a calendar quarter (ARM 17.8.321).

A.10. Continuous Opacity Monitoring System (COMS) shall be operated and maintained on the No. 4 Recovery Boiler (ARM 17.8.1201(10)).

A.11. M2Green shall operate and maintain an electrostatic precipitator (ESP) on the No. 4 Recovery Boiler (ARM17.8.1201(10)).

A.12. M2Green shall provide a reasonable assurance of compliance with the emission limitations or standards for the operation of the emitting unit by following the Compliance Assurance Monitoring (CAM) plan contained in Appendix E of this permit (ARM 17.8.1504).

Compliance Demonstration

A.13. M2Green shall maintain a record of the daily black liquor firing rate for the No. 4 Recovery Boiler to monitor compliance with Section V.A.1 (ARM 17.8.1213).

A.14. Annually, monitoring compliance with the Section V.A.2 through A.4 standards shall be determined by EPA source sampling methods specified in 40 CFR Part 60, Appendix A, including back-half particulate. PM_{10} sampling methods are specified by 40 CFR Part 51, Appendix M. Total particulate results may be used as a surrogate for PM_{10} if the impinger analysis ("back-half") is included. M2Green shall test the No. 4 Recovery Boiler for total particulate and PM_{10} at 90% or greater of maximum rated capacity to monitor compliance with Section V.A.2 and V.A.3 (ARM 17.8.1213).

If the results from the annual testing are at 80% of the permit limitation or greater, then testing shall occur on a semi-annual basis. After M2Green tests' results are below 80% of the permit limitations, then M2Green may return to annual testing no later than 1 year from the last test date (ARM 17.8.749 and ARM 17.8.1213).

A.15. Monitoring compliance with the Section V.A.5 shall be determined by EPA source sampling methods specified in 40 CFR Part 60, Appendix A. This testing and compliance demonstration shall take place every two years or on another testing/monitoring schedule as may be approved by the Department (ARM 17.8.1213).

A.16. The TRS CEM is not required to conform to federal specifications. The monitor shall be of a type and installation approved by the Department, to monitor compliance with Section V.A.5 and A.6 (ARM 17.8.749 and ARM 17.8.1213).

A.17. Monthly emissions shall be determined by continuous opacity monitoring and the correlation equations to monitor compliance with Section V.A.7 (ARM 17.8.1213).

A.18. The COMS shall be installed, calibrated, and maintained in accordance with 40 CFR §63.864 to monitor compliance with the requirements of Section V.A.7 and V.A.9 (ARM 17.8.342 and 40 CFR 63, Subpart MM).

A.19. M2Green shall notify the Department of any proposed changes to the correlation equations used to determine particulate mass emissions to monitor compliance with Section V.A.8 (ARM 17.8.749 and ARM 17.8.1213).

A.20. Compliance with Section V.A.9 shall be determined with the COMS as the primary measure of compliance with the opacity limit, except that 40 CFR Part 60, Appendix A, Method 9, may be used as a measure of compliance when there is reason to believe that COMS data is not accurate or when COMS data is unavailable (ARM 17.8.321(15)).

A.21. The COMS are required to conform to federal specifications. The COMS are required to provide a daily (mill day) average opacity reading to monitor compliance with Section V.A.10 (ARM 17.8.749 and ARM 17.8.1213).

A.22. M2Green shall monitor compliance with Section V.A.11 by documenting all maintenance and repair activities on the ESP on the No. 4 Recovery Boiler and by documenting whenever the ESP is not operated during recovery boiler operation. The records must include, but are not limited to, the date, time, and action(s) taken for repair and maintenance (ARM 17.8.1213).

A.23. M2Green shall monitor compliance with Section V.A.12 by monitoring emissions according to the CAM Plan contained in Appendix E of this permit (ARM 17.8.1503 and ARM 17.8.1213).

Recordkeeping

A.24. The record of the daily black liquor firing rate for the No. 4 Recovery Boiler shall be maintained on site and submitted to the Department in the monthly report (ARM 17.8.1212).

A.25. All compliance source test recordkeeping shall be performed in accordance with the test method used, and shall be maintained on site. The reports must be submitted to the Department in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106 and ARM 17.8.1212).

A.26. M2Green shall maintain records in accordance with 40 CFR §63.866 to verify operation and maintenance of the COMS required by Section V.A.18 (ARM 17.8.342 and 40 CFR 63, Subpart MM).

A.27. M2Green shall operate and maintain the TRS CEM and records shall be submitted to the Department upon request (ARM 17.8.1212).

A.28. The opacity monitors required to monitor compliance with SectionV.A.7 will provide a 24-hour average opacity that will be converted to gr/dscf and then converted to lb/day and lb/day monthly average using the correlation between opacity and particulate emissions. M2Green shall maintain a correlation between opacity and particulate emissions (from stack test results) and use this correlation to calculate daily and monthly averages (ARM 17.8.749 and ARM 17.8.1212).

A.29. M2Green shall maintain records of all supporting documentation for any proposed changes to the correlation equations on site and shall submit these records to the Department upon request to monitor compliance with Section V.A.19.

A.30. The COMS shall be operated and maintained and records shall be submitted to the Department upon request to monitor compliance with the opacity limitation (ARM 17.8.1212).

A.31. M2Green shall maintain records required by Section V.A.22 on site and submit the information to the Department upon request (ARM 17.8.1212).

A.32. M2Green shall maintain CAM applicable records in accordance with 40 CFR Part 64 and the CAM Plan contained in Appendix E of this permit (ARM 17.8.1212 and 40 CFR Part 64).

Reporting

A.33. M2Green shall submit a monthly report to the Department within 30 days following the end of the month. The monthly report shall include (ARM 17.8.749 and ARM 17.8.1212):

a. The daily black liquor firing rate for the No. 4 Recovery Boiler.

b. Daily averages for TRS for the No. 4 Recovery Boiler.

c. A monthly average for pounds of sulfur emitted per 1000 pounds of black liquor burned for the No. 4 Recovery Boiler.

d. Monthly average of the daily total particulate emissions as determined by the correlation equations for the No. 4 Recovery Boiler. This report shall include daily calculated grain loading (gr/dscf), air flow (dscfm), total particulate (lb/hour), and the 24-hour average opacity.

e. A summary of opacities from the No. 4 Recovery Boiler equal to or greater than 20% averaged over 6 consecutive minutes.

A.34. Quarterly, M2Green shall submit excess emission reports for the COM. This report shall include (ARM 17.8.749 and ARM 17.8.1212):

a. The magnitude of excess emissions computed in accordance with 60.13(h), any conversion factors used, and the date and time of commencement and completion of each time period of excess emissions.

b. Specific identification of each period of excess emissions that occurs during startups, shutdowns, and malfunctions of the affected facility; the nature and cause of any malfunction (if known); the corrective action taken or preventative measures adopted.

c. The date and time identifying each period during which the continuous monitoring system was inoperative, except for zero and span checks.

d. When no excess emissions have occurred, or the continuous monitoring systems have been inoperative such information shall be stated in the report.

e. The excess emission reports shall be completed in a format supplied or approved by the Department.

A.35. The semiannual monitoring report shall provide (ARM 17.8.1212):

a. A summary of results of the last source testing that was performed; and,

b. Notification of any proposed changes to the correlation equations, if applicable.

A.36. The annual compliance certification report required by Section VIII.B must contain a certification statement for the above applicable requirements (ARM 17.8.1212).

B. No. 5 Recovery Boiler

EU003 – No. 5 Recovery Boiler

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration Method	Compliance Demonstration Frequency	Reporting Requirements
B.1, B.14, B.25, B.35, B.38	Black Liquor Firing Rate	Daily Rate	Maintain Log	Daily	Monthly
B.2, B.15, B.16, B.26, B.27, B.37, B.38	TSP	0.044gr/dscf corrected to 8% O_2 633.6 lb/Day 26.4 lb/hr	40 CFR Part 60, Appendix A	Annually / Semi-annual if above 80% of permit limit	Semi-annual
			COMs	Ongoing	Semi-annual
B.3, B.15, B.26, B.37, B.38	PM_{10}	633.6 lb/ Day 26.4 lb/hr	40 CFR Part 51, Appendix M	Annually / Semi-annual if above 80% of permit limit	Semi-annual
B.4, B.15, B.26, B.37, B.38	Total Sulfate	633.6 lb/ Day 26.4 lb/hr	40 CFR Part 60, Appendix B	Annually / Semi-annual if above 80% of permit limit	Semi-annual
B.5, B.15, B.17, B.26, B.35, B.37, B.38	Total Reduced Sulfur	≤ 5 ppm corrected to 8% O_2, 12-hr Average	CEM	Ongoing	Monthly
B.6, B.17, B.28, B.36, B.37, B.38	Total Reduced Sulfur	CEM	Operate and Maintain	Ongoing	Semi-annual
			EER Reports	As Necessary	Quarterly
B.7, B.18, B.29, B.35, B.38	TSP	384 lb/Day – Monthly Average	COM Data & Correlation Equations	Monthly	Monthly
B.8, B.19, B.30, B.37, B.38	Correlation Equations	Proposed Changes	Request Department Approval	As Necessary	Semi-annual
B.9, B.20, B.31, B.35, B.38	Opacity	20%	COM Method 9	Ongoing	Monthly
B.10, B.21, B.31, B.37, B.38	Opacity	COM	Performance Specification 1 in 40 CFR Part 60, Appendix B	Ongoing	Semi-annual
B.11, B.22, B.32, B.37, B.38	Particulate Emissions	Operate and Maintain ESP	Recordkeeping	As Necessary	Semi-annual
B.12, B.23, B.33, B.36, B.37, B.38	No. 5 Recovery Boiler	40 CFR 60, Subpart BB	40 CFR 60, Subpart BB	40 CFR 60, Subpart BB	Semi-annual
			EER Reports	As Necessary	Quarterly
B.13, B.24, B.34, B.37, B.38	CAM Plan	CAM Plan Appendix E	CAM Plan Appendix E	Ongoing	Semiannual

Conditions

B.1. M2Green shall report monthly the daily black liquor firing rate for the No. 5 Recovery Boiler (ARM 17.8.749).

B.2. Total suspended particulate emissions from the No. 5 Recovery Boiler shall not exceed 0.044 gr/dscf corrected to 8% O_2 (ARM 17.8.340; 40 CFR 60, Subpart BB and ARM 17.8.342; 40 CFR 63, Subpart MM) and in no case shall exceed 633.6 lb/day and 26.4 lb/hr (ARM 17.8.1201(10)).

B.3. PM_{10} emissions from the No. 5 Recovery Boiler shall not exceed 633.6 lb/day and 26.4 lb/hr (ARM 17.8.1201(10)).

B.4. Total sulfate emissions from the No. 5 Recovery Boiler shall not exceed 633.6 lb/day and 26.4 lb/hr (ARM 17.8.1201(10)).

B.5. Total reduced sulfur emissions from the No. 5 Recovery Boiler shall not exceed 5 ppm corrected to 8% oxygen, 12-hour average (ARM 17.8.1201(10)).

B.6. A TRS CEM is required by state permit and federal regulation for the No. 5 Recovery Boiler. The TRS CEM is not required to be operated when the boiler is fired solely on natural gas (ARM 17.8.1201(10)).

B.7. The monthly average total suspended particulate for the No. 5 Recovery Boiler shall not exceed 384 lb/day (ARM 17.8.749 and ARM 17.8.1201(10)).

B.8. M2Green shall submit for approval to the Department any proposed changes to the correlation equations used to determine particulate mass emissions (ARM 17.8.1201(10)).

B.9. M2Green shall not discharge into the outdoor atmosphere emissions from the No. 5 Recovery Boiler that exhibit 20% opacity or greater averaged over 6 consecutive minutes for more than 3% of the 6-minute time periods during which the No. 5 Recovery Boiler is operating within a calendar quarter (ARM 17.8.321).

B.10. A COMS is required by state permit and federal regulations for the No. 5 Recovery Boiler. The COMS is not required to be operated when the boiler is fired solely on natural gas (ARM 17.8.1201(10)).

B.11. M2Green shall operate and maintain an ESP on the No. 5 Recovery Boiler. ESP operation is not required when the boiler is fired solely on natural gas (ARM 17.8.1201(10)).

B.12. M2Green shall comply with all applicable standards and limitations, and the reporting, recordkeeping, and notification requirements contained in 40 CFR 60, Subpart BB-Standards of Performance for Kraft Pulp Mills, that includes, but is not limited to, the completion of the quarterly excess emission reports (EERs) (ARM 17.8.340 and 40 CFR 60, Subpart BB).

B.13. M2Green shall provide a reasonable assurance of compliance with the emission limitations or standards for the operation of the emitting unit by following the CAM plan contained in Appendix E of this permit (ARM 17.8.1504).

Compliance Demonstration

B.14. M2Green shall maintain a record of the daily black liquor firing rate for the No. 5 Recovery Boiler to monitor compliance with Section V.B.1 (ARM 17.8.1213).

B.15. Annually, monitoring compliance with the Section V.B.2 through B.4 standards shall be determined by EPA source sampling methods specified in 40 CFR Part 60, Appendix A. PM_{10} sampling methods are specified by 40 CFR Part 51, Appendix M or total particulate results may be used as a surrogate for PM_{10} if the impinger analysis ("back-half") is included. M2Green shall test the No. 5 Recovery Boiler for total particulate and PM_{10} at 90% or greater of maximum rated capacity to monitor compliance with Section V.B.2. TRS emissions are determined by continuous monitoring methods specified in 40 CFR Part 60, Appendix B, Performance Specifications, 1 through 6, as applicable to monitor compliance with Section V.B.5. Back half is not required since this is an NSPS source.

If the results from the annual testing are at 80% of the permit limitation or greater, then testing shall occur on a semi-annual basis. After M2Green tests' results are below 80% of the permit limitations, then M2Green may return to annual testing no later than one year from the last test date (ARM 17.8.1213).

B.16. The COMS shall be installed, calibrated, and maintained in accordance with 40 CFR §63.864 to monitor compliance with the requirements of Section V.B.2 (ARM 17.8.342 and 40 CFR 63, Subpart MM).

B.17. The TRS CEM shall conform to federal specifications as required by 40 CFR Part 60, Appendix B, Specification 5, to monitor compliance with Section V.B.5 and B.6. Quality Assurance/Quality Control (QA/QC) Procedures specified in 40 CFR Part 60, Appendix F must be followed, except that when a daily calibration drift test if failed, the only data invalidated is that collected between the failed calibration drift check and the next successful calibration drift check (ARM 17.8.1213).

B.18. Monthly emissions shall be determined by continuous opacity monitoring and the correlation equations to monitor compliance with Section V.B.7 (ARM 17.8.1213).

B.19. M2Green shall notify the Department of any proposed changes to the correlation equations used to determine particulate mass emissions to monitor compliance with Section V.B.8 (ARM 17.8.1213).

B.20. Monitoring compliance with Section V.B.9 shall be determined with COMS as the primary measure of compliance with the opacity limit, except that 40 CFR Part 60, Appendix A, Method 9, may be used as a measure of compliance when there is reason to believe COMS data is not accurate or when COMS data is unavailable (ARM 17.8.321(15)).

B.21. The COMS shall conform to Performance Specification 1 found in 40 CFR Part 60, Appendix B, to monitor compliance with Section V.B.10. This COMS shall have a span set at 70 percent opacity as required by 40 CFR, Part 60, Appendix B and Subpart BB (ARM 17.8.1213, ARM 17.8.340 and 40 CFR 60, Subpart BB).

B.22. M2Green shall monitor compliance with Section V.B.11 by documenting all maintenance and repair activities on the ESP on the No. 5 Recovery Boiler and by documenting whenever the ESP is not operated during recovery boiler operation. The records must include, but are not limited to, the date, time, and action(s) taken for repair and maintenance (ARM 17.8.1213).

B.23. M2Green shall maintain compliance in accordance with 40 CFR 60, Subpart BB, to monitor compliance with Section V.B.12 (ARM 17.8.340 and 40 CFR 60, Subpart BB).

B.24. M2Green shall monitor compliance with Section V.B.13 by monitoring emissions according to the CAM Plan contained in Appendix E of this permit (ARM 17.8.1503 and ARM 17.8.1213).

Recordkeeping

B.25. The record of the daily black liquor firing rate for the No. 5 Recovery Boiler shall be maintained on site and submitted to the Department in the monthly report (ARM 17.8.1212).

B.26. All compliance source test recordkeeping shall be performed in accordance with the test method used, and shall be maintained on site. The reports must be submitted to the Department in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106 and ARM 17.8.1212).

B.27. M2Green shall maintain records in accordance with 40 CFR §63.866 to verify operation and maintenance of the COMS required by Section V.B.16 (ARM 17.8.342 and 40 CFR 63, Subpart MM).

B.28. M2Green shall operate and maintain the TRS CEM and records shall be submitted to the Department upon request. Records indicating the dates and hours that the No. 5 Recovery Boiler is fired solely on natural gas shall also be maintained (ARM 17.8.1212).

B.29. The opacity monitors required to monitor compliance with Section V.B.7 will provide a 24-hour average opacity that will be converted to gr/dscf and then converted to lb/day and lb/day monthly average using the correlation equations. M2Green shall maintain a correlation between opacity and particulate emissions (from stack test results) and use this correlation to calculate daily and monthly averages (ARM 17.8.749 and ARM 17.8.1212).

B.30. M2Green shall maintain records of all supporting documentation for any proposed changes to the correlation equations on site and shall submit these records to the Department upon request to monitor compliance with Section V.B.19 (ARM 17.8.1212).

B.31. The COM shall be operated and maintained and records shall be submitted to the Department upon request. Records indicating the dates and hours that the No. 5 Recovery Boiler is fired solely on natural gas shall also be maintained (ARM 17.8.1212).

B.32. M2Green shall maintain the records required by Section V.B.22 on site and submit the information to the Department upon request (ARM 17.8.1212).

B.33. M2Green shall maintain records in accordance with 40 CFR 60, Subpart BB (ARM 17.8.340 and 40 CFR 60, Subpart BB).

B.34. M2Green shall maintain CAM applicable records in accordance with 40 CFR Part 64 and the CAM Plan contained in Appendix E of this permit (ARM 17.8.1212 and 40 CFR Part 64).

Reporting

B.35. M2Green shall submit a monthly report to the Department within 30 days following the end of the month. The monthly report shall include (ARM 17.8.749 and ARM 17.8.1212):

a. The daily black liquor firing rate for the No. 5 Recovery Boiler.

b. M2Green shall include a report of the average TRS on a 12-hour basis.

c. A monthly average for pounds of sulfur emitted per 1000 pounds of black liquor burned for the No. 5 Recovery Boiler.

d. Monthly average the daily total particulate emissions as determined by the correlation equations for the No. 5 Recovery Boiler. This report shall include daily calculated grain loading (gr/dscf), air flow (dscfm), total particulate (lb/hour), and the 24-hour average opacity. M2Green shall report percent O_2 and grain loading (gr/dscf) corrected for O_2.

e. M2Green shall provide a summary of opacities from the No. 5 Recovery Boiler equal to or greater than 20% averaged over 6 consecutive minutes.

f. The dates and number of hours that the No. 5 Recovery Boiler was fired solely on natural gas.

B.36. Quarterly, M2Green shall submit excess emission reports for the CEM and COM required by NSPS as specified in 40 CFR Part 60.7(c). This report shall include (ARM 17.8.749 and ARM 17.8.340):

a. The magnitude of excess emissions computed in accordance with 60.13(h), any conversion factors used, and the date and time of commencement and completion of each time period of excess emissions.

b. Specific identification of each period of excess emissions that occurs during startups, shutdowns, and malfunctions of the affected facility; the nature and cause of any malfunction (if known); the corrective action taken or preventative measures adopted.

c. The date and time identifying each period during which the continuous monitoring system was inoperative, except for zero and span checks.

d. When no excess emissions have occurred, or the continuous monitoring systems have been inoperative, such information shall be stated in the report.

e. The excess emission reports shall be completed in a format supplied or approved by the Department.

B.37. The semiannual monitoring report shall provide (ARM 17.8.1212):

a. A summary of results of the last source testing that was performed; and

b. Notification of any proposed changes to the correlation equations.

B.38. The annual compliance certification report required by Section VIII.B must contain a certification statement for the above applicable requirements (ARM 17.8.1212).

C. No. 4 Smelt Dissolving Tank

EU016 – No. 4 Smelt Dissolving Tank

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration Method	Compliance Demonstration Frequency	Reporting Requirements
C.1, C.6, C.10, C.13, C.14	Opacity	20%	Method 9	As Required by the Department and Section III.A.1	Semi-annual
C.2, C.7, C.10, C.13, C.14	TSP	0.20 lb/ton of black liquor solids processed 607 lb/day 25.29 lb/hr	40 CFR Part 60, Appendix A	Annually	Semi-annual
C.3, C.7, C.10, C.13, C.14	PM_{10}	607 lb/day 25.29 lb/hr	40 CFR Part 51 Appendix M	Annually	Semi-annual
C.4, C.8, C.11, C.13, C.14	Particulate Emissions	Venturi Scrubber	40 CFR 63 Subpart MM	Ongoing	Semi-annual (in MACT II Excess Emissions and Continuous Monitoring System Performance and Summary Report)
C.5, C.9, C.12, C.13, C.14	CAM Plan	CAM Plan Appendix E	CAM Plan Appendix E	Ongoing	Semi-annual

Conditions

C.1. M2Green shall not cause or authorize emissions from the No. 4 Smelt Dissolving Tank to be discharged into the outdoor atmosphere that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.304(2)).

C.2. Total suspended particulate emissions from the No. 4 Smelt Dissolving Tank shall not exceed 0.20 lb/ton of black liquor solids processed (ARM 17.8.342 and 40 CFR 63, Subpart MM) and, in no case, shall exceed 607 lb/day and 25.29 lb/hr (ARM 17.8.1201(10)).

C.3. PM_{10} emissions from the No. 4 Smelt Dissolving Tank shall not exceed 607 lb/day and 25.29 lb/hr (ARM 17.8.1201(10)).

C.4. M2Green shall operate and maintain a wet venturi scrubber on the No. 4 Smelt Dissolving Tank (ARM 17.8.1201(10)).

C.5. M2Green shall provide a reasonable assurance of compliance with the emission limitations or standards for the operation of the emitting unit by following the CAM plan contained in Appendix E of this permit (ARM 17.8.1504).

Compliance Demonstration

C.6. As required by the Department and Section III.A.1, M2Green shall perform a Method 9 test in accordance with the Montana Source Test Protocol and Procedures Manual to monitor compliance with Section V.C.1. Each observation period shall be a minimum of 6 minutes unless

any one reading is 20% or greater; then the observation period shall be a minimum of 20 minutes or until a violation of the standard has been documented, whichever is a shorter period of time (ARM 17.8.105 and ARM 17.8.1213).

C.7. Annually, monitoring compliance with Section V.C.2 and C.3 standards for the No. 4 Smelt Dissolving Tank shall be accomplished by EPA source sampling methods specified in 40 CFR Part 60, Appendix A. PM_{10} sampling methods are specified by 40 CFR Part 51, Appendix M. Total particulate results may be used as a surrogate for PM_{10} if the impinger analysis ("back-half") is included (ARM 17.8.1213).

C.8. The continuous parameter monitoring systems (CPMS) shall be installed, calibrated, and maintained in accordance with the requirements of 40 CFR §63.864(e)(10) to measure the pressure drop across the scrubber and the scrubbing liquid recirculation flow rate to monitor compliance with Section V.C.4 (ARM 17.8.342 and 40 CFR 63, Subpart MM).

C.9. M2Green shall monitor compliance with Section V.C.5 by monitoring emissions according to the CAM Plan contained in Appendix E of this permit (ARM 17.8.1503 and ARM 17.8.1213).

Recordkeeping

C.10. All compliance source test recordkeeping shall be performed in accordance with the test method used, and shall be maintained on site. The reports must be submitted to the Department in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106 and ARM 17.8.1212).

C.11. M2Green shall maintain records in accordance with 40 CFR 63.866 to verify operation and maintenance requirements in Section V.C.4 and C.8 (ARM 17.8.342 and 40 CFR 63, Subpart MM).

C.12. M2Green shall maintain CAM applicable records in accordance with 40 CFR Part 64 and the CAM Plan contained in Appendix E of this permit (ARM 17.8.1212 and 40 CFR Part 64).

Reporting

C.13. The semiannual monitoring report shall provide a summary of results of the last source testing that was performed (ARM 17.8.1212).

C.14. The annual compliance certification report required by Section VIII.B must contain a certification statement for the above applicable requirements (ARM 17.8.1212).

D. No. 5 Smelt Dissolving Tank

EU017 – No. 5 Smelt Dissolving Tank

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration Method	Compliance Demonstration Frequency	Reporting Requirements
D.1, D.7, D.12, D.16, D.17	Opacity	20%	Method 9	As Required by the Department and Section III.A.1	Semi-annual
D.2, D.8, D.12, D.16, D.17	TSP	0.20 lb/ton Black Liquor Solids Processed 120 lb/Day 5.0 lb/hr	40 CFR Part 60, Appendix A	Annually	Semi-annual
D.3, D.8, D.12, D.16, D.17	PM_{10}	120 lb/Day 5.00 lb/hr	40 CFR Part 51, Appendix M	Annually	Semi-annual
D.4, D.9, D.13, D.16, D.17	Particulate Emissions	Wet Scrubber	40 CFR 63, Subpart MM	Ongoing	Semi-annual (in MACT II Excess Emissions and Continuous Monitoring System Performance and Summary Report)
D.5, D.10, D.14, D.16, D.17	No.5 Smelt Dissolving Tank	40 CFR 60, Subpart BB	40 CFR 60, Subpart BB	40 CFR 60, Subpart BB	Semi-annual
D.6, D.11, D.15, D.16, D.17	CAM Plan	CAM Plan Appendix E	CAM Plan Appendix E	Ongoing	Semi-annual

Conditions

D.1. M2Green shall not cause or authorize emissions from the No. 5 Smelt Dissolving Tank to be discharged into the outdoor atmosphere that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.304(2)).

D.2. Total suspended particulate emissions from the No. 5 Smelt Dissolving Tank shall be limited to 0.20 lb/ton black liquor solids processed (ARM 17.8.342 and 40 CFR 63, Subpart MM), but in no case shall it exceed 120 lb/day and 5.0 lb/hr. (ARM 17.8.340 and 40 CFR 60, Subpart BB.).

D.3. PM_{10} emissions from the No. 5 Smelt Dissolving Tank shall not exceed 120 lb/day and 5.00 lb/hr (ARM 17.8.1201(10)).

D.4. M2Green shall operate and maintain a wet scrubber on the No. 5 Smelt Dissolving Tank (ARM 17.8.1201(10)).

D.5. M2Green shall comply with all applicable standards and limitations, and the reporting, recordkeeping, and notification requirements contained in the 40 CFR 60, Subpart BB-Standards of Performance for Kraft Pulp Mills (ARM 17.8.340 and 40 CFR 60, Subpart BB).

D.6. M2Green shall provide a reasonable assurance of compliance with the emission limitations or standards for the operation of the emitting unit by following the CAM plan contained in Appendix EF of this permit (ARM 17.8.1504).

Compliance Demonstration

D.7. As required by the Department and Section III.A.1, M2Green shall perform a Method 9 test in accordance with the Montana Source Test Protocol and Procedures Manual to monitor compliance with Section V.D.1. Each observation period shall be a minimum of 6 minutes unless any one reading is 20% or greater; then the observation period shall be a minimum of 20 minutes or until a violation of the standard has been documented, which ever is a shorter period of time (ARM 17.8.105 and ARM 17.8.1213).

D.8. Annually, monitoring compliance with Section V.D.2 and D.3 shall be accomplished by EPA source sampling methods specified in 40 CFR Part 60, Appendix A and Subpart BB. PM_{10} sampling methods are specified by 40 CFR Part 51, Appendix M. Total particulate results may be used as a surrogate for PM_{10} if the impinger analysis ("back-half") is included (ARM 17.8.1213).

D.9. During times when the No. 5 Smelt Dissolving Tank is operated, the continuous parameter monitoring systems (CPMS) shall be installed, calibrated, and maintained in accordance with the requirements of 40 CFR §63.864(e)(10) using an alternative monitoring method. The alternative monitoring parameters shall include scrubber liquid flow, scrubber fan operation, and explosion damper position to demonstrate compliance with Section V.D.4 (ARM 17.8.342 and 40 CFR 63, Subpart MM).

D.10. M2Green shall monitor compliance with Section V.D.5 in accordance with 40 CFR 60, Subpart BB (ARM 17.8.340 and 40 CFR 60, Subpart BB).

D.11. M2Green shall monitor compliance with Section V.D.6 by monitoring emissions according to the CAM Plan contained in Appendix E of this permit (ARM 17.8.1503 and ARM 17.8.1213).

Recordkeeping

D.12. All compliance source test recordkeeping shall be performed in accordance with the test method used, and shall be maintained on site. The reports must be submitted to the Department in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106 and ARM 17.8.1212).

D.13. M2Green shall maintain records in accordance with 40 CFR §63.866 to verify operation and maintenance requirements in Section V.D.4 and D.9 (ARM 17.8.342 and 40 CFR 63, Subpart MM).

D.14. M2Green shall maintain records in accordance with 40 CFR 60, Subpart BB (ARM 17.8.340 and 40 CFR 60, Subpart BB).

D.15. M2Green shall maintain CAM applicable records in accordance with 40 CFR Part 64 and the CAM Plan contained in Appendix E of this permit (ARM 17.8.1212 and 40 CFR Part 64).

Reporting

D.16. The semiannual monitoring report shall provide a summary of results of the last source testing that was performed (ARM 17.8.1212).

D.17. The annual compliance certification report required by Section VIII.B must contain a certification statement for the above applicable requirements (ARM 17.8.1212).

E. Multi-fuel Boiler

EU021 – Multi-fuel Boiler

Condition(s)	Pollutant/ Parameter	Permit Limit	Compliance Demonstration Method	Compliance Demonstration Frequency	Reporting Requirements
E.1, E.21, E.35, E.48, E.49	Opacity	20%	Method 9	As Required by the Department and Section III.A.1	Semi-annual
E.2, E.22, E.36, E.46, E.49	Steam Production	Daily Production	Maintain Log	Daily	Monthly
E.3, E.23, E.37, E.48, E.49	Dewatered Sludge Consumption	21,900 ton/yr	Maintain a Production Log	Daily Logging	Semi-annual
E.4, E.24, E.38, E.48, E.49	Dewatered Sludge	≤ 0.4% Sulfur Content	Sulfur Analysis	Annually	Semi-annual
E.5, E.25, E.39, E.48, E.49	Multi-fuel Boiler Fuel	Dewatered Sludge from Primary Clarifier	Recordkeeping	As Necessary	Semi-annual
E.6, E.25, E.39, E.48, E.49	Dewatered Sludge	Thoroughly Blended w/ Existing Hog Fuel	Recordkeeping	As Necessary	Semi-annual
E.7, E.26, E.40, E.48, E.49	pH of Scrubber Water	pH Maintained > 7	pH check	Weekly	Semi-annual
E.8, E.24, E.37, E.38, E.48, E.49	SO_2 from combustion of primary clarifier sludge	5.70 lb/hr	Dewatered sludge consumption/sulfur content	Daily/ Annually	Semi-annual
E.9, E.27, E.35, E.48, E.49	TSP	0.10 lb/MMBtu 52.04 lb/hr 1,249 lb/Day	40 CFR Part 60, Appendix A	Annually	Semi-annual
E.10, E.27, E.35, E.48, E.49	PM_{10}	0.1 lb/MMBtu 52.04 lb/hr 1,249 lb/Day	40 CFR Part 51, Appendix M	Annually	Semi-annual
E.11, E.28, E.41, E.47, E.48, E.49	SO_2	0.80 lb/MMBtu 429.6 lb/hr Firing Liquid Fossil Fuel or Liquid Fossil Fuel & Wood Residue	CEMs	Ongoing	Quarterly
E.12, E.28, E.30, E.35, E.41, E.47, E.48, E.49	NO_x	0.30 lb/MMBtu 161.1 lb/hr Firing Liquid or Gaseous Fossil Fuel & Wood Residue, & Exclusively Natural Gas	CEMs	Ongoing	Quarterly
			Method 7	As Required by the Department and Section III.A.1	Semi-annual
E.13, E.28, E.41, E.48, E.49	SO_2	CEM	40 CFR 60 Appendix B Specification 2	Ongoing	Semi-annual
E.14, E.28, E.41, E.48, E.49	NO_x	CEM	40 CFR 60 Appendix B Specification 2	Ongoing	Semi-annual
E.15, E.29, E.41, E.48, E.49	Either Oxygen or Carbon Dioxide	CEM	Operate and Maintain in Accordance w/ 40 CFR Part 60.45	Ongoing	Semi-annual
E.16, E.30, E.35, E.48, E.49	SO_2	1.2 lb/MMBtu Firing Solid Fuel or Solid Fuel w/ Wood Residue	Method 8	As Required by the Department and Section III.A.1	Semi-annual

E.17, E.31, E.42, E.47, E.48, E.49	Multi-fuel Boiler	40 CFR 60, Subpart D	40 CFR 60, Subpart D	40 CFR 60, Subpart D	Semi-annual
			EER Reports	As Necessary	Quarterly
E.18, E.32, E.43, E.48, E.49	Waste Plastic Combustion Rate	15.1 tons/Day 468 tons/Month 5,616 tons/12-month rolling per.	Maintain a Log	Ongoing	Semi-annual
E.19, E.33, E.44, E.48, E.49	Multi-fuel Boiler	Operate and Maintain two wet venturi scrubbers, in parallel	Recordkeeping	Weekly	Semi-annual
E.20, E.34, E.45, E.48, E.49	CAM Plan	CAM Plan Appendix E	CAM Plan Appendix E	Ongoing	Semi-annual

Conditions

E.1. M2Green shall not cause or authorize emissions from the Multi-fuel Boiler to be discharged into the outdoor atmosphere that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes, except for one 6-minute period per hour of not more than 27% opacity (ARM 17.8.340 and 40 CFR 60, Subpart D).

E.2. M2Green shall report, monthly, the daily steam production for the Multi-fuel Boiler (ARM 17.8.1201(10)).

E.3. Consumption of dewatered sludge from the sludge dewatering plant by the Multi-fuel Boiler shall not exceed a total of 21,900 ton/year (ARM 17.8.752).

E.4. Sulfur content of the dewatered sludge used as fuel for the Multi-fuel Boiler shall not exceed 0.4% on an as received basis (ARM 17.8.752).

E.5. Any dewatered sludge used as fuel in the Multi-fuel Boiler shall originate from the primary clarifier (ARM 17.8.749).

E.6. The dewatered sludge shall be thoroughly blended with the existing hog fuel (ARM 17.8.749).

E.7. The pH of the scrubber water on the Multi-fuel Boiler shall be maintained at greater than 7 (ARM 17.8.749).

E.8. Emissions of SO_2 from the combustion of primary clarifier sludge in the Multi-fuel Boiler shall be limited to 5.70 lb/hr (ARM 17.8.752).

E.9. Total suspended particulate emissions from the Multi-fuel Boiler shall not exceed 0.10 pound per million British thermal units (lb/MMBtu) fired and 52.04 lb/hr and 1,249 lb/day (ARM 17.8.340 and 40 CFR 60, Subpart D,).

E.10. PM_{10} emissions from the Multi-fuel Boiler shall not exceed 1,249 lb/day and 52.04 lb/hr and 0.1 lb/million Btu fired (ARM 17.8.1201(10)).

E.11. Sulfur dioxide emissions from the Multi-fuel Boiler shall not exceed 0.80 lb/million Btu and 429.6 lb/hr when firing liquid fossil fuel or liquid fossil fuel and wood residue (ARM 17.8.340 and 40 CFR 60, Subpart D).

E.12. Nitrogen dioxide (NO_2) emissions from the Multi-fuel Boiler shall not exceed 0.30 lb/million Btu and 161.1 lb/hr when firing liquid fossil fuel, liquid fossil fuel and wood residue, or gaseous fossil fuel and wood residue. This limit also applies when firing exclusively on natural gas because of a malfunction of the wood feed or ash handling systems. NO_2 emissions from the Multi-fuel Boiler shall not exceed 0.20 lb/million Btu when firing natural gas for more than 24 consecutive hours. (ARM 17.8.340 and 40 CFR 60, Subpart D).

E.13. A sulfur dioxide CEM is required by federal regulation and state permit when the Multi-fuel Boiler is fired on oil (ARM 17.8.1201(10)).

E.14. A nitrogen oxides CEM is required by federal regulation and state permit for the Multi-fuel Boiler (ARM 17.8.1201(10)).

E.15. Either an oxygen or carbon dioxide CEM is required as provided in 40 CFR 60.45 (ARM 17.8.340 and 40 CFR 60, Subpart D).

E.16. Sulfur dioxide emissions from the Multi-fuel Boiler shall not exceed 1.2 lb/million Btu when firing solid fuel or solid fuel with wood residue (ARM 17.8.340 and 40 CFR 60, Subpart D).

E.17. M2Green shall comply with all applicable standards and limitations, and the reporting, recordkeeping, and notification requirements contained in 40 CFR 60, Subpart D-Standards of Performance for Fossil-Fuel-Fired Steam Generators for Which Construction is Commenced After August 17, 1971, that includes, but is not limited to, the completion of the quarterly EERs (ARM 17.8.340 and 40 CFR 60, Subpart D).

E.18. M2Green shall be limited to the waste plastic combustion rate (on a dry basis) of 15.1 ton/day, 468 ton/month, and 5,616 tons during any 12-month rolling period (ARM 17.8.1201(10)).

E.19. M2Green shall operate and maintain two wet venturi scrubbers, operated in parallel, on the Multi-fuel Boiler. When firing only natural gas in the boiler, the entire stack gas flow may be routed through one scrubber and the other scrubber secured for maintenance purposes. (ARM 17.8.1201(10)).

E.20. M2Green shall provide a reasonable assurance of compliance with the emission limitations or standards for the operation of the emitting unit by following the CAM plan contained in Appendix E of this permit (ARM 17.8.1504).

Compliance Demonstration

E.21. As required by the Department and Section III.A.1, M2Green shall perform a Method 9 test in accordance with the Montana Source Test Protocol and Procedures Manual to monitor compliance with Section V.E.1. Each observation period shall be a minimum of 6 minutes unless any one reading is 20% or greater; then the observation period shall be a minimum of 20 minutes or until a violation of the standard has been documented, whichever is a shorter period of time (ARM 17.8.105 and ARM 17.8.1213).

E.22. M2Green shall maintain a record of the daily steam production for the Multi-fuel Boiler to monitor compliance with Section V.E.2 (ARM 17.8.1213).

E.23. M2Green shall maintain a log of the consumption of dewatered sludge by the Multi-fuel Boiler to monitor compliance with Section V.E.3 (ARM 17.8.1213).

E.24. Annually, M2Green shall conduct an analysis of the dewatered sludge to monitor compliance with the sulfur limitation contained in Section V.E.4 and V.E.8. M2Green does not have to conduct separate analyses for the Multi-fuel Boiler if the sample of the dewatered sludge is taken prior to introduction to the Multi-fuel Boiler (ARM 17.8.1213).

E.25. M2Green shall document whenever dewatered sludge used as fuel for the Multi-fuel Boiler originated from other than the primary clarifier and the dewatered sludge is not thoroughly blended with existing hog fuel to monitor compliance with Section V.E.5 and E.6 (ARM 17.8.1213).

E.26. M2Green shall conduct weekly pH checks on the scrubber to monitor compliance with Section V.E.7 (ARM 17.8.1213).

E.27. Annually, monitoring compliance with Section V.E.9 and E.10 shall be accomplished by EPA source sampling methods specified in 40 CFR Part 60, Appendix A and Subpart D. PM_{10} sampling methods are specified by 40 CFR Part 51, Appendix M. Total particulate results may be used as a surrogate for PM_{10} if the impinger analysis ("back-half") is included. M2Green shall test the Multi-fuel Boiler for total particulate and PM_{10} at 90% or greater of the maximum daily average steam production rate achieved during the last three whole calendar months preceding the test to monitor compliance with Section V.E.9 and E.10. Daily average steam production shall be the average hourly steam production during a mill day. As required by the Department and Section III.A.1, M2Green shall also complete chloride testing to monitor compliance when burning waste plastic (ARM 17.8.1213).

E.28. The nitrogen oxides and sulfur dioxide CEMs shall conform to federal specifications as required by Specification 2, 40 CFR Part 60, Appendix B, to monitor compliance with Section V.E.11, E.12, E.13, and E.14. Quality Assurance/Quality Control (QA/QC) Procedures specified in 40 CFR Part 60, Appendix F must be followed, except that when a daily calibration drift test is failed, the only data invalidated is that collected between the failed calibration drift check and the next successful calibration drift check (ARM 18.7.1213).

E.29. M2Green shall verify that either the oxygen or carbon dioxide CEM is operated and maintained in accordance with 40 CFR Part 60.45 to monitor compliance with Section V.E.15. QA/QC Procedures specified in 40 CFR Part 60, Appendix F must be followed, except that when a daily calibration drift test is failed, the only data invalidated is that collected between the failed calibration drift check and the next successful calibration drift check (ARM 17.8.1213).

E.30. As required by the Department and Section III.A.1, M2Green shall conduct Method 7 and Method 8 source tests to monitor compliance with Section V.E.12 and V.E.16 (ARM 17.8.1213).

E.31. M2Green shall maintain compliance as required by 40 CFR 60, Subpart D, to monitor compliance with Section V.E.17 (ARM 17.8.340 and 40 CFR 60, Subpart D).

E.32. M2Green shall maintain a log of the amount of waste plastic that is transported to the hog fuel pile on a daily basis. By the 25th day of each month, M2Green shall total the waste plastic material that has been transported to the hog fuel pile during the previous month. The monthly information will be used to verify compliance with the rolling 12-month limitation in Section V.E.18 (ARM 17.8.1213).

E.33. M2Green shall monitor compliance with Section V.E.19 by documenting, weekly, scrubber shower water flows and the scrubber pressure differential (ARM 17.8.1201(10)).

E.34. M2Green shall monitor compliance with Section V.E.20 by monitoring emissions according to the CAM Plan contained in Appendix E of this permit (ARM 17.8.1503 and ARM 17.8.1213).

Recordkeeping

E.35. All compliance source test recordkeeping shall be performed in accordance with the test method nsed, and shall be maintained on site. The reports must be submitted to the Department in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106 and ARM 17.8.1212).

E.36. M2Green shall record the daily steam production for the Multi-fuel Boiler. The daily steam production shall be maintained on site and submitted to the Department in the monthly report (ARM 17.8.1212).

E.37. M2Green shall maintain records of the daily consumption of dewatered sludge off the press, including records of sludge plant flow rates and sludge solids content. All sludge sampling records shall include the date, time, and initials of the person performing the analysis (ARM 17.8.1212).

E.38. M2Green shall maintain copies on site of all analyses of the dewatered sludge for a minimum of 5 years. Copies of the analyses shall be submitted to the Department upon request (ARM 17.8.1212).

E.39. M2Green shall maintain the records required by Section V.E.25 on site and submit the information to the Department upon request (ARM 17.8.1212).

E.40. M2Green shall maintain a log of the pH checks that include the date and time, and the recorder's initials (ARM 17.8.1212).

E.41. M2Green shall maintain the records for the CEMs on site and submit them to the Department in accordance with Specification 2, 40 CFR Part 60, Appendix B, and 40 CFR 60.45 (ARM 17.8.340 and 40 CFR 60, Subpart D).

E.42. M2Green shall maintain records in accordance with 40 CFR 60, Subpart D (ARM 17.8.340 and 40 CFR 60, Subpart D).

E.43. The log of the waste plastic as required by Section V.E.32 shall be maintained on site and submitted to the Department upon request (ARM 17.8.1212).

E.44. M2Green shall maintain records required by Section V.E.33 on site and submit the information to the Department upon request (ARM 17.8.1212).

E.45. M2Green shall maintain CAM applicable records in accordance with 40 CFR Part 64 and the CAM Plan contained in Appendix E of this permit (ARM 17.8.1212 and 40 CFR 64).

Reporting

E.46. M2Green shall submit a monthly report to the Department within 30 days following the end of the month. The monthly report shall include (ARM 17.8.1212):

a. The daily steam production for the Multi-fuel Boiler; and

b. The 3-hour averages for SO_2 and NO_x (as lb/MMBtu) as specified by federal regulations for the Multi-fuel Boiler.

E.47. Quarterly, M2Green shall submit excess emission reports for NO_x and SO_2 continuous emission monitors required by NSPS as specified in 40 CFR Part 60.7(c). This report shall include (ARM 17.8.749 and ARM 17.8.1212):

a. The magnitude of excess emissions computed in accordance with 60.13(h), any conversion factors used, and the date and time of commencement and completion of each time period of excess emissions.

b. Specific identification of each period of excess emissions that occurs during startups, shutdowns, and malfunctions of the affected facility; the nature and cause of any malfunction (if known); the corrective action taken or preventative measures adopted.

c. The date and time identifying each period during which the continuous monitoring system was inoperative, except for zero and span checks.

d. When no excess emissions have occurred, or the continuous monitoring systems have been inoperative, such information shall be stated in the report.

e. The excess emission reports shall be completed in a format supplied or approved by the Department.

E.48. The semiannual monitoring report shall provide (ARM 17.8.1212):

a. A summary of results of the last source testing that was performed;

b. Monthly totals of sludge burned in the boiler and the maximum 12-month total for the period;

c. Monthly totals of waste plastic burned in the boiler and the maximum 12-month total for the period;

d. A summary of any excursions of the scrubber liquid flow or scrubber differential pressure as defined in the Compliance Assurance Monitoring plan in Appendix E.

E.49. The annual compliance certification report required by Section VIII.B must contain a certification statement for the above applicable requirements (ARM 17.8.1212).

F. Lime Kilns

EU011 – No. 1 Lime Kiln (Currently curtailed)
EU012 – No. 2 Lime Kiln (Currently curtailed)
EU013 – No. 3 Lime Kiln
EU014 – No. 4 Lime Kiln

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration Method	Compliance Demonstration Frequency	Reporting Requirements
F.1, F.24, F.33, F.41, F.42	No. 1, 2, and 3 Lime Kiln Opacity	40%	Method 9	As Required by the Department and Section III.A.1	Semi-annual
F.2, F.24, F.33, F.41, F.42	No. 4 Lime Kiln Opacity	20%	Method 9	As Required by the Department and Section III.A.1	Semi-annual
F.3, F.25, F.33, F.41, F.42	No. 1 Lime Kiln TSP	0.064 gr/dscf Corrected to 10% O_2 288 lb/Day 12.0 lb/hr	40 CFR Part 60, Appendix A & 40 CFR Part 51, Appendix M	Once every two years	Semi-annual
F.4, F.25, F.33, F.41, F.42	No. 1 Lime Kiln PM_{10}	288 lb/Day 12.0 lb/hr			
F.5, F.25, F.33, F.41, F.42	No. 1 Lime Kiln Total Sulfate	259 lb/Day 10.79 lb/hr			
F.6, F.25, F.28, F.33, F.35, F.39, F.42	No. 1 Lime Kiln Total Reduced Sulfur	≤20 ppm 24-hr Average	40 CFR Part 60, Appendix A	Once every two years	Monthly
F.7, F.25, F.33, F.41, F.42	No. 2 Lime Kiln TSP	0.064 gr/dscf Corrected to 10% O_2 266 lb/Day 11.08 lb/hr	40 CFR Part 60, Appendix A & 40 CFR Part 51, Appendix M	Once every two years	Semi-annual
F.8, F.25, F.33, F.41, F.42	No. 2 Lime Kiln PM_{10}	266 lb/Day 11.08 lb/hr			
F.9, F.25, F.33, F.41, F.42	No. 2 Lime Kiln Total Sulfate	239 lb/Day 9.96 lb/hr			
F.10, F.25, F.28, F.33, F.35, F.39, F.42	No. 2 Lime Kiln Total Reduced Sulfur	≤20 ppm 24-hr Average	40 CFR Part 60, Appendix A	Once every two years	Monthly
F.11, F.25, F.27, F.33, F.41, F.42	No. 3 Lime Kiln TSP	0.064 gr/dscf Corrected to 10% O_2 359 lb/Day 14.96 lb/hr	40 CFR Part 60, Appendix A & 40 CFR Part 51, Appendix M	Once every two years	Semi-annual
F.12, F.25, F.33, F.41, F.42	No. 3 Lime Kiln PM_{10}	359 lb/Day 14.96 lb/hr			
F.13, F.25, F.33, F.41, F.42	No. 3 Lime Kiln Total Sulfate	323 lb/Day 13.46 lb/hr			

F.14, F.25, F.28, F.33, F.35, F.39, F.42	No. 3 Lime Kiln Total Reduced Sulfur	≤20 ppm 24-hr Average	40 CFR Part 60, Appendix A	Once every two years	Monthly
F.15, F.26, F.27, F.33, F.41, F.42	No. 4 Lime Kiln TSP	0.064 gr/dscf Corrected to 10% O_2 204.0 lb/Day 8.50 lb/hr	40 CFR Part 60, Appendix A & 40 CFR Part 51, Appendix M & 40 CFR Part 60, Subpart BB	Once every two years	Semi-annual
F.16, F.26, F.33, F.41, F.42	No. 4 Lime Kiln PM_{10}	204.0 lb/Day 8.50 lb/hr			
F.17, F.26, F.33, F.41, F.42	No. 4 Lime Kiln Total Sulfate	204.0 lb/Day 8.50 lb/hr			
F.18, F.26, F.35, F.39, F.42	No. 4 Lime Kiln Total Reduced Sulfur	≤8.0 ppm 12-hr Average	CEM	Ongoing w/ 12-hr Averages	Monthly
F.19, F.29, F.35, F.41, F.42	TRS – No. 1, 2, & 3 Lime Kilns	CEM by State Permit	Operate and Maintain	Ongoing	Semi-annual
F.20, F.30, F.36, F.41, F.42	TRS – No. 4 Lime Kiln	CEM by State Permit & Federal Regulation	Operate and Maintain in Accordance w/ 40 CFR 60, Appendix B Specification 5	Ongoing	Semi-annual
F.21, F.31, F.37, F.40, F.41, F.42	No.4 Lime Kiln	40 CFR 60, Subpart BB	40 CFR 60, Subpart BB	40 CFR 60, Subpart BB	Semi-annual
			EER Reports	As Necessary	Quarterly
F.22, F.27, F.34, F.41, F.42	All Four Lime Kilns	Venturi Scrubbers	40 CFR 63 Subpart MM	Ongoing	Semi-annual (in MACT II Excess Emissions and Continuous Monitoring System Performance and Summary Report)
F.23, F.32, F.38, F.41, F.42	CAM Plan	CAM Plan Appendix E	CAM Plan Appendix E	Ongoing	Semi-annual

Conditions

F.1. M2Green shall not cause or authorize emissions from each of the No. 1, 2, and 3 Lime Kilns to be discharged into the outdoor atmosphere that exhibit an opacity of 40% or greater averaged over 6 consecutive minutes (ARM 17.8.304(1)).

F.2. M2Green shall not cause or authorize emissions from the No. 4 Lime Kiln to be discharged into the outdoor atmosphere that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.304(2)).

F.3. Total suspended particulate emissions from the No. 1 Lime Kiln shall not exceed 0.064 gr/dscf corrected to 10% O_2 (ARM 17.8.342 and 40 CFR 63, Subpart MM) and, in no case, shall exceed 288 lb/day and 12.0 lb/hr (ARM 17.8.1201(10)).

F.4. PM_{10} emissions from the No. 1 Lime Kiln shall not exceed 288 lb/day and 12.0 lb/hr (ARM 17.8.1201(10)).

F.5. Total sulfate emissions from the No. 1 Lime Kiln shall not exceed 259 lb/day and 10.79 lb/hr (ARM 17.8.1201(10)).

F.6. Total reduced sulfur emissions from the No. 1 Lime Kiln shall not exceed 20 ppm, 24-hour average (ARM 17.8.1201(10)).

F.7. Total suspended particulate emissions from the No. 2 Lime Kiln shall not exceed 0.064 gr/dscf corrected to 10% O_2 (ARM 17.8.342 and 40 CFR 63, Subpart MM) and, in no case, shall exceed 266 lb/day and 11.08 lb/hr (ARM 17.8.1201(10)).

F.8. PM_{10} emissions from the No. 2 Lime Kiln shall not exceed 266 lb/day and 11.08 lb/hr (ARM 17.8.1201(10)).

F.9. Total sulfate emissions from the No. 2 Lime Kiln shall not exceed 239 lb/day and 9.96 lb/hr (ARM 17.8.1201(10)).

F.10. Total reduced sulfur emissions from the No. 2 Lime Kiln shall not exceed 20 ppm, 24-hour average (ARM 17.8.1201(10)).

F.11. Total suspended particulate emissions from the No. 3 Lime Kiln shall not exceed 0.064 gr/dscf corrected to 10% O_2 (ARM 17.8.342 and 40 CFR 63, Subpart MM) and, in no case, shall exceed 359 lb/day and 14.96 lb/hr (ARM 17.8.1201(10)).

F.12. PM_{10} emissions from the No. 3 Lime Kiln shall not exceed 359 lb/day and 14.96 lb/hr (ARM 17.8.1201(10)).

F.13. Total sulfate emissions from the No. 3 Lime Kiln shall not exceed 323 lb/day and 13.46 lb/hr (ARM 17.8.1201(10)).

F.14. Total reduced sulfur emissions from the No. 3 Lime Kiln shall not exceed 20 ppm, 24-hour average (ARM 17.8.1201(10)).

F.15. Total suspended particulate emissions from the No. 4 Lime Kiln shall be limited to 0.064 gr/dscf corrected to 10 percent O_2 (ARM 17.8.342 and 40 CFR, Subpart MM), and, in no case, shall it exceed 204.0 lb/day and 8.50 lb/hr (ARM 17.8.340 and 40 CFR 60, Subpart BB.).

F.16. PM_{10} emissions from the No. 4 Lime Kiln shall not exceed 204.0 lb/day and 8.50 lb/hr (ARM 17.8.1201(10)).

F.17. Total sulfate emissions from the No. 4 Lime Kiln shall not exceed 204.0 lb/day and 8.50 lb/hr (ARM 17.8.1201(10)).

F.18. Total reduced sulfur emissions from the No. 4 Lime Kiln shall not exceed 8.0 ppm corrected to 10% O_2, 12-hour average (ARM 17.8.1201(10)).

F.19. A TRS CEM is required by state permit for the No. 1, No. 2, and No. 3 Lime Kilns (ARM 17.8.1201(10)).

F.20. A TRS CEM is required by state permit and federal regulations for the No. 4 Lime Kiln (ARM 17.8.1201(10)).

F.21. M2Green shall comply with all applicable standards and limitations, and the reporting, recordkeeping, and notification requirements contained in the New Source Performance Standards for, as appropriate: 40 CFR 60, Subpart BB-Standards of Performance for Kraft Pulp Mills as it applies to the No. 4 Lime Kiln, which includes but is not limited to the completion of the quarterly EERs (ARM 17.8.340 and 40 CFR 60, Subpart BB).

F.22. M2Green shall operate and maintain a wet venturi scrubber on each of the four lime kilns (ARM 17.8.1201(10)).

F.23. M2Green shall provide a reasonable assurance of compliance with the emission limitations or standards for the operation of the emitting unit by following the CAM plan contained in Appendix E of this permit (ARM 17.8.1504).

Compliance Demonstration

F.24. As required by the Department and Section III.A.1, M2Green shall perform a Method 9 test in accordance with the Montana Source Test Protocol and Procedures Manual to monitor compliance with Section V.F.1 and F.2. Each observation period shall be a minimum of 6 minutes unless any one reading is 40% or 20% or greater, whichever is applicable; then the observation period shall be a minimum of 20 minutes or until a violation of the standard has been documented, which ever is a shorter period of time (ARM 17.8.105 and ARM 17.8.1213).

F.25. Once every two years, monitoring compliance with the above Section V.F.3- F.5, F.7-F.9, and F.11-F.13 standards shall be accomplished by EPA source sampling methods specified in 40 CFR Part 60, Appendix A, including back-half particulate. PM_{10} sampling methods are specified by 40 CFR Part 51, Appendix M, including back-half particulate. Total particulate results may be used as a surrogate for PM_{10} if the impinger analysis ("back-half") is included (ARM 17.8.1213).

F.26. Once every two years, monitoring compliance with the Section V.F.15 through F.17 standards shall be accomplished by EPA source sampling methods specified in 40 CFR Part 60, Appendix A and Subpart BB. PM_{10} sampling methods are specified by 40 CFR Part 51, Appendix M. Total particulate results may be used as a surrogate for PM_{10} if the impinger analysis ("back-half") is included. TRS emissions are determined by continuous monitoring, with 12-hour averages to monitor compliance with Section V.F.18 (ARM 17.8.1213).

F.27. The CPMS shall be installed, calibrated, and maintained in accordance with the requirements of 40 CFR §63.864(e)(10) to measure the pressure drop across the scrubber and the scrubbing liquid recirculation rate for the scrubbers. Scrubbing liquid flow rate monitoring for the No. 3 and 4 Lime Kilns will be limited to the recirculation liquid flow rate to the "racetrack" portion of the quench section to demonstrate compliance with Section V.F.11 and F.15 (ARM 17.8.342 and 40 CFR 63, Subpart MM).

F.28. Monitoring compliance with the Sections V.F.6, F.10, and F.14 shall be determined by EPA source sampling methods specified in 40 CFR Part 60, Appendix A. This testing and compliance demonstration shall take place once every two years or on another testing/monitoring schedule as may be approved by the Department (ARM 17.8.1213).

F.29. The TRS CEM required by Section V.F.19 is not required to conform to federal specifications. The monitors shall be of a type and installation approved by the Department (ARM 17.8.1213).

F.30. The TRS CEM required by Section V.F.20 shall conform to federal specifications as required by 40 CFR Part 60, Appendix B, Specification 5. Quality Assurance/Quality Control (QA/QC) Procedures specified in 40 CFR Part 60, Appendix F must be followed, except that when a daily calibration drift test is failed, the only data invalidated is that collected between the failed calibration drift check and the next successful calibration drift check (ARM 17.8.1213).

F.31. M2Green shall monitor compliance as required by 40 CFR 60, Subpart BB (ARM 17.8.340 and 40 CFR 60, Subpart BB).

F.32. M2Green shall monitor compliance with Section V.F.23 by monitoring emissions according to the CAM Plan contained in Appendix E of this permit (ARM 17.8.1503 and ARM 17.8.1213).

Recordkeeping

F.33. All compliance source test recordkeeping shall be performed in accordance with the test method used, and shall be maintained on site. The reports must be submitted to the Department in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106 and ARM 17.8.1212).

F.34. M2Green shall maintain records in accordance with 40 CFR §63.866 to verify operation and maintenance requirements in Section V.F.27 (ARM 17.8.342 and 40 CFR 63, Subpart MM).

F.35. M2Green shall maintain records of the daily average TRS for the No. 1, No. 2 and No. 3 Lime Kilns. M2Green shall maintain records of the 12-hour average TRS for the No. 4 Lime Kiln (ARM 17.8.1212).

F.36. M2Green shall maintain the records for the CEMs on site and submit them to the Department in accordance with 40 CFR Part 60, Appendix B, Specification 5 (ARM 17.8.1212).

F.37. M2Green shall maintain records in accordance with 40 CFR 60, Subpart BB (ARM 17.8.340 and 40 CFR 60, Subpart BB).

F.38. M2Green shall maintain CAM applicable records in accordance with 40 CFR Part 64 and the CAM Plan contained in Appendix E of this permit (ARM 17.8.1212 and 40 CFR Part 64).

Reporting

F.39. M2Green shall submit a monthly report to the Department within 30 days following the end of the month. The monthly report shall include the daily average TRS concentrations on the No.1, No.2, and No. 3 Lime Kilns. M2Green shall include a report on a 12-hour basis for the No. 4 Lime Kiln. M2Green shall also include the number of hours the corresponding piece of equipment was down or malfunctioning (ARM 17.8.749 and ARM 17.8.1212).

F.40. Quarterly, M2Green shall submit excess emission report for the No 4 Lime Kiln TRS continuous emission monitor required by NSPS as specified in 40 CFR Part 60.7(c). This report shall include (ARM 17.8.340 and 40 CFR 60, Subpart BB):

a. The magnitude of excess emissions computed in accordance with 60.13(h), any conversion factors used, and the date and time of commencement and completion of each time period of excess emissions.

b. Specific identification of each period of excess emissions that occurs during startups, shutdowns, and malfunctions of the affected facility; the nature and cause of any malfunction (if known); the corrective action taken or preventative measures adopted.

c. The date and time identifying each period during that the continuous monitoring system was inoperative, except for zero and span checks.

d. When no excess emissions have occurred, or the continuous monitoring systems have been inoperative, such information shall be stated in the report.

e. The excess emission reports shall be completed in a format supplied or approved by the Department.

F.41. The semiannual monitoring report shall provide a summary of results of the last source testing that was performed (ARM 17.8.1212).

F.42. The annual compliance certification report required by Section VIII.B must contain a certification statement for the above applicable requirements (ARM 17.8.1212).

G. Lime Slakers

EU018 – No. 1 Lime Slaker
EU019 – No. 2 Lime Slaker
EU020 – No.3. Lime Slaker
EU039 – Salt Cake/Lime Unloading

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration Method	Compliance Demonstration Frequency	Reporting Requirements
G.1, G.11, G.15, G.17, G.18	No. 1 Lime Slaker Opacity	40%	Method 9	As Required by the Department and Section III.A.1	Semi-annual
G.2, G.11, G.15, G.17, G.18	No. 2 and No. 3 Lime Slaker, Salt Cake/Lime Unloading Opacity	20%	Method 9	As Required by the Department and Section III.A.1	Semi-annual
G.3, G.12, G.15, G.17, G.18	No. 1 Lime Slaker TSP	110 lb/day 4.58 lb/hr	40 CFR Part 60, Appendix A 40 CFR Part 51, Appendix M	Annually	Semi-annual
G.4, G.12, G.15, G.17, G.18	No. 1 Lime Slaker PM_{10}	110 lb/day 4.58 lb/hr			
G.5, G.13, G.15, G.17, G.18	No. 2 Lime Slaker TSP	146 lb/day 6.08 lb/hr	40 CFR Part 60, Appendix A 40 CFR Part 51, Appendix M	As Required by the Department and Section III.A.1	Semi-annual
G.6, G.13, G.15, G.17, G.18	No. 2 Lime Slaker PM_{10}	146 lb/day 6.08 lb/hr			
G.7, G.13, G.15, G.17, G.18	No. 3 Lime Slaker TSP	72 lb/day 3.00 lb/hr	40 CFR Part 60, Appendix A 40 CFR Part 51, Appendix M	As Required by the Department and Section III.A.1	Semi-annual
G.8, G.13, G.15, G.17, G.18	No. 3 Lime Slaker PM_{10}	72 lb/day 3.00 lb/hr			
G.9, G.14, G.16, G.17, G.18	No. 1, 2, and 3 Lime Slakers	Operate and Maintain Wet Scrubbers	Recordkeeping	Monthly	Semi-annual
G.10, G.14, G.16, G.17, G.18	Salt Cake/Lime Unloading	Operate and Maintain a Baghouse	Recordkeeping	Monthly	Semi-annual

Conditions

G.1. M2Green shall not cause or authorize emissions from the No. 1 Lime Slaker to be discharged into the outdoor atmosphere that exhibit an opacity of 40% or greater averaged over 6 consecutive minutes (ARM 17.8.304(1)).

G.2. M2Green shall not cause or authorize emissions from the No. 2 and No. 3 Lime Slakers, Salt Cake/Lime Unloading to be discharged into the outdoor atmosphere that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.304(2)).

G.3. Total suspended particulate emissions from the No. 1 Lime Slaker shall not exceed 110 lb/day and 4.58 lb/hr (ARM 17.8.1201(10)).

G.4. PM_{10} emissions from the No. 1 Lime Slaker shall not exceed 110 lb/day and 4.58 lb/hr (ARM 17.8.1201(10)).

G.5. Total suspended particulate emissions from the No. 2 Lime Slaker shall not exceed 146 lb/day and 6.08 lb/hr (ARM 17.8.752).

G.6. PM_{10} emissions from the No. 2 Lime Slaker shall not exceed 146 lb/day and 6.08 lb/hr (ARM 17.8.752).

G.7. Total suspended particulate emissions from the No. 3 Lime Slaker shall not exceed 72 lb/day and 3.00 lb/hr (ARM 17.8.1201(10)).

G.8. PM_{10} emissions from the No. 3 Lime Slaker shall not exceed 72 lb/day and 3.00 lb/hr (ARM 17.8.1201(10)).

G.9. M2Green shall operate and maintain a wet scrubber on each of the three lime slakers (ARM 17.8.1201(10)).

G.10. M2Green shall operate and maintain a baghouse on the salt cake/lime unloading (ARM 17.8.1201(10)).

Compliance Demonstration

G.11. As required by the Department and Section III.A.1, M2Green shall perform a Method 9 test in accordance with the Montana Source Test Protocol and Procedures Manual to monitor compliance with Section V.G.1 and G.2. Each observation period shall be a minimum of 6 minutes unless any one reading is 40% or 20% or greater, whichever is applicable; then the observation period shall be a minimum of 20 minutes or until a violation of the standard has been documented, which ever is a shorter period of time (ARM 17.8.105 and ARM 17.8.1213).

G.12. Annually, monitoring compliance with the above Section V.G.3 and G.4 standards shall be accomplished by EPA source sampling methods specified in 40 CFR Part 60, Appendix A. PM_{10} sampling methods are specified by 40 CFR Part 51, Appendix M. Total particulate results may be used as a surrogate for PM_{10} if the impinger analysis ("back-half") is included (ARM 17.8.1213).

G.13. As required by the Department and Section III.A.1, monitoring compliance with the above Section V.G.5, G.6, G.7, and G.8 standards shall be accomplished by EPA source sampling methods specified in 40 CFR Part 60, Appendix A. PM_{10} sampling methods are specified by 40 CFR Part 51, Appendix M. Total particulate results may be used as a surrogate for PM_{10} if the impinger analysis ("back-half") is included (ARM 17.8.1213).

G.14. M2Green shall monitor compliance with Sections V.G.9 and V.G.10 by documenting whenever the wet scrubbers on each of the three lime slakers and the baghouse on the salt cake/lime unloading are not operated during source operation and shall keep records of repair and maintenance activities to the wet scrubbers and baghouse. The records must include, but are not limited to, the date, time, and action(s) taken for repair and maintenance (ARM 17.8.1213).

Recordkeeping

G.15. All compliance source test recordkeeping shall be performed in accordance with the test method used, and shall be maintained on site. The reports must be submitted to the Department in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106 and ARM 17.8.1212).

G.16. M2Green shall maintain the records required by Section V.G.14 on site and submit the information to the Department upon request (ARM 17.8.1212).

Reporting

G.17. The semiannual monitoring report shall provide a summary of results of the last source testing that was performed (ARM 17.8.1212):

G.18. The annual compliance certification report required by Section VIII.B must contain a certification statement for the above applicable requirements (ARM 17.8.1212).

H. Condensate Collection (40 CFR 63, Subpart S)

EU109 – Condensate Collection
EU109a – No. 1 and No. 2 Evaporators (Foul Condensate)
EU109b – No. 3 Evaporator (Combined Condensate)
EU109c – No. 3 Evaporator (Foul Condensate)
EU109d – No. 4 Evaporator (Condensate from Effect No. 2)
EU109e - No. 4 Evaporator (Foul Condensate)
EU109f - No. 2 Concentrator/No. 5 Evaporator (Foul Condensate)
EU109g - No. 1 Concentrator (Foul Condensate)
EU109h - Turpentine Decanter (Condensate)
EU109i - Batch Digester Blow Heat Recovery System - (Condensate from Accumulator Secondary Condenser)
EU109j - LVHC-NCG Line Drains
EU109k - Foul Condensate Tank
EU109l - Black Liquor Spill Tank No. 1

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration Method	Compliance Demonstration Frequency	Reporting Requirements
H.1, H.3, H.6, H.8, H.9	Digester Production	Measure as ODT Pulp	Calculation	Daily	Semi-annual (in MACT I Excess Emissions and Continuous Monitoring System Performance and Summary Report)
H.2, H.4, H.5, H.6, H.7, H.8, H.9	Mass MeOH in Collected Specified Condensate	Collect via Closed Drain System	Visual Inspection	Each Calendar Month	Semi-annual
		7.2 lb MeOH/ODT Pulp	Initial Test – NCASI 94.03 Direct Injection Test Methods for Methanol	60-Day Initial Test & Every 5-Years & 60-Day Rolling Average	Semi-annual (in MACT I Excess Emissions and Continuous Monitoring System Performance and Summary Report)

Conditions

H.1. M2Green shall measure the mill-wide batch and continuous digester production as oven-dried tons of pulp per day (ARM 17.8.342 and 40 CFR 63.446(c)(3)).

H.2. M2Green shall collect in a closed drain system sufficient condensate from the specified sources above, so that the combined condensates from the specified sources shall contain at least 7.2 lbs methanol per oven dried ton pulp (MeOH/ODTP) on a 60-day rolling average (ARM 17.8.342 and 40 CFR 63.446(c)(3)(d)).

Compliance Demonstration

H.3. M2Green shall calculate the mill-wide daily pulp production using the following methodology (equations a-c) to monitor compliance with Section V.H.1 (ARM 17.8.1213):

a. Fiber usage on machines (tons, as produced) = Paper machine production (tons, as produced) +/- change in Cull production inventory (tons, as produced)

b. Fiber usage on machines (oven-dry tons) = Fiber usage on machines (tons, as produced) x (1.0 – moisture content of paper – chemical additive content of the linerboard)

c. Wood pulp production (ODT) = Fiber usage on machines (ODT) – OCC usage on machines (ODT) +/- Wood pulp high density storage change (ODT).

H.4. M2Green shall visually inspect the closed drain system's integrity at least once each calendar month for leaks to monitor compliance with Section V.H.2 (ARM 17.8.342 and 40 CFR 63.453).

H.5. M2Green has performed an initial 60-day test to determine condensate flow and, using the NCASI 94.03 direct injection test method for methanol, the concentration and mass of methanol in the collected condensate. The collected test data will be used to develop methanol collection factors. M2Green shall do a subsequent test once every five years to verify or revise the methanol collection factors as appropriate. M2Green shall determine the methanol collected on a 60-day rolling average to monitor compliance with Section V.H.2 using the methanol collection factors from the initial or subsequent tests (ARM 17.8.1213).

Recordkeeping

H.6. M2Green shall maintain the calculations, on site, of the digesters production and the mass of methanol and the methanol collection factors as required by Section V.H.3 and H.5. The calculations shall be submitted to the Department upon request (ARM 17.8.1212).

H.7. M2Green shall maintain on site logs of the visual inspections when completing the compliance demonstrations as required by Sections V.H.4. The logs shall include the date of the inspection, equipment type and identification, results of negative pressure tests for enclosures, results of leak detection tests, the nature of the defect or leak and the method of detection, and the observer's initials (ARM 17.8.342 and 40 CFR 63.454).

Reporting

H.8. The semiannual monitoring report shall provide a summary of any corrective actions taken to correct leaks in the closed drain system (ARM 17.8.1212).

H.9. The annual compliance certification report required by Section VIII.B must contain a certification statement for the above applicable requirements (ARM 17.8.1212).

I. Low Volume, High Concentration (LVHC) and High Volume, Low Concentration (HVLC) Non-Condensable Gases (NCG) (40 CFR 63, Subpart S)

EU110 – LVHC-NCG
EU110a - No. 1 and No. 2 Evaporators: Vacuum Vents
EU110b – No. 3 Evaporator: Vacuum Vents
EU110c – No. 4 Evaporator: Vacuum Vents
EU110d – No. 5 Evaporator: Vacuum Vents
EU110e – No. 2 Concentrator: Hotwell and Vacuum System Vent
EU110f – No. 1 Concentrator: Hotwell and Vacuum System Vent
EU110g – M&D Digester: Blow Heat System Vent
EU110h – Turpentine Condenser Vent
EU110I - No. 1 and No. 2 Evaporators After Condenser Hotwell Vents
EU110j - No. 3 and No. 4 Evaporators Hotwell Vents
EU110k - No. 2 Concentrator, No. 5 Evaporator Spiral Condenser Vent, and Hotwell Vent
EU110l - No. 1 Black Liquor Spill Tank Vent
EU110m - No. 3 Blow Tank
EU110n - No. 1 and No. 2 Blow Tanks
EU110o - Foul Condensate Tank
EU110p - No. 4 Evaporator Auxiliary Surface Condenser and After Condensers Vents
EU154c - Steam Stripper-off gas
EU110q – Spill Collection Tank – Weak Black Liquor (Secondary)
EU026b – Base Stock Washer Exhaust
EU026c – No. 1 Base Stock Filtrate Tank
EU026d – No. 2 Base Stock Filtrate Tank
EU026o – Top Stock Foam Tower and Filtrate Tank
EU026q – Top Stock Washer Exhaust

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration Method	Compliance Demonstration Frequency	Reporting Requirements
I.1, I.2, I.3, I.4, I.5	LVHC-NCG and HVLC-NCG	Closed Vent System	Visual Inspection – Integrity of the Closed Vent System	Each Calendar Month	Semi-annual
			§63.457(d) No Detectable Leaks	Initially & Annually	
			Potential Excess Emission Reports	Ongoing	

Conditions

I.1. M2Green shall operate and maintain a closed vent system for the specified LVHC-NCG and HVLC-NCG that is routed to a control device that meets the requirements specified in 40 CFR 63.443(d) and 63.446(e) (ARM 17.8.342; 40 CFR 63.443(c); and 40 CFR 63.446(d)).

Compliance Demonstration

I.2. M2Green shall inspect the closed vent system's integrity at least once every calendar month. The visual inspection shall include the valves, piping, ductwork, enclosures, and connections for visible evidence of defects. If leaks are identified, M2Green shall start repairs within 5 days and complete repairs within 15 days (40 CFR 63.453). M2Green has conducted an initial leak test on the closed vent system that has demonstrated compliance with Section V.I.1. M2Green shall conduct annual leak tests on the closed vent system to monitor compliance with Section V.I.1. The initial and annual tests to monitor no detectable leaks shall be completed as required by §63.457(d) (ARM 17.8.342 and 40 CFR 63, Subpart S).

Recordkeeping

I.3. M2Green shall maintain on site, logs when completing the monitoring demonstrations as required by Sections V.I.2. The logs shall include the date of the inspection, equipment type and identification, results of the nature of the defect or leak and the method of detection, and the observer's initials (ARM 17.8.342 and 40 CFR 63.454).

Reporting

I.4. The semiannual monitoring report shall provide a summary of any corrective actions taken to correct leaks in the closed vent system and the closed drain system with a summary of any testing completed (ARM 17.8.1212).

I.5. The annual compliance certification report required by Section VIII.B must contain a certification statement for the above applicable requirements (ARM 17.8.1212).

J. Steam Stripper

EU154 – Steam Stripper
EU154a – Steam Stripper Vent
EU154b – Steam Stripper Feed Tank

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration Method	Compliance Demonstration Frequency	Reporting Requirements
J.1, J.4, J.7, J.10, J.11	Gaseous Emissions from Steam Stripper	Ducted to Thermal Oxidizer	Recordkeeping	As Necessary	Semi-annual
J.2, J.3, J.5, J.6, J.8, J.9, J.10, J.11	Steam Stripper	92 percent (by weight) methanol removed in specified collected condensate	Initial Test – NCASI 94.03 Direct Injection Test Methods for Methanol	60-Day Initial Test & Every 5 Years & 60-Day Rolling Average	Semi-annual (in MACT I Excess Emissions and Continuous Monitoring System Performance and Summary Report)
			Parameter Monitoring	Ongoing	
		Excess emissions from steam stripper and evaporator systems shall not exceed 10 percent (including SSM events)	Parameter Monitoring	Ongoing	

Conditions

J.1. All gaseous emissions from the Steam Stripper shall be ducted to the thermal oxidizer for oxidation of reduced sulfur compounds (ARM 17.8.749).

J.2. M2Green shall determine the methanol mass, concentration, and methanol treated in the collected condensate sent to, and from the Steam Stripper (ARM 17.8.342 and 40 CFR 63.446(e)(3)).

J.3. M2Green shall reduce hazardous air pollutants (HAPs), measured as methanol, on a 60-day rolling average by recycling collected condensates specified in Section V.H (EU109) to systems, including the evaporator system, equipped with vent control or by removal in the steam stripper of at least 92 percent (by weight) of methanol per oven-dried ton pulp criteria (ARM 17.8.342 and 40 CFR 63.446(e)(3)).

Excess emissions for the steam stripper system and, when used as an alternative means of treating collected condensates, the evaporator system shall not exceed 10 percent (including startup, shutdown, or malfunction) during a semi-annual period (ARM 17.8.342 and 40 CFR 63.446 (g)).

Compliance Demonstration

J.4. M2Green shall document all instances, on a 15-minute basis, that the gaseous emissions from the Steam Stripper are not ducted to the thermal oxidizer to monitor compliance with Section V.J.1 (ARM 17.8.1213).

J.5. Once every five years after the initial test, M2Green shall perform a 60-day test to determine the methanol treatment factors. The test shall be conducted to determine condensate flow, using the NCASI 94.03 direct injection test method for methanol and the concentration and mass of methanol treated in the steam stripper. M2Green will use the collected test data and steam stripper operating parameters (Section IV.J.6) to develop methanol treatment factors. M2Green shall determine the methanol treatment on a 60-day rolling average to monitor compliance with

Section V.J.2 and J.3 using the methanol collection factors from the initial or subsequent tests (ARM 17.8.1213).

J.6. M2Green shall continuously monitor the following parameters for methanol removal as required by Section IV.J.3. The data will be used to monitor compliance on a 60-day rolling average (ARM 17.8.1213).

a. Steam Stripper - Steam feed rate,

b. Steam Stripper - Process wastewater (collected condensate) feed rate

c. Steam Stripper - Column feed temperature and

d. Collected condensate overflow from the feed tanks for the steam stripper system and evaporator system.

Recordkeeping

J.7. M2Green shall maintain the records required by Section V.J.4 on site and submit the information to the Department upon request (ARM 17.8.1212).

J.8. M2Green shall maintain on site the daily averages of the steam stripper operating parameters listed in V.J.5, and the calculations demonstrating methanol treatment by the steam stripper. The calculations shall be submitted to the Department upon request (ARM 17.8.1212).

J.9. M2Green shall maintain a summary of the continuous data collected as required by Section V.J.6 and submit it to the Department as required by 40 CFR 63, Subpart S (ARM 17.8.342 and 40 CFR 63, Subpart S).

Reporting

J.10. The semiannual monitoring report shall provide a summary of all instances when gaseous emissions from the Steam Stripper are not ducted to the thermal oxidizer (ARM 17.8.1212).

J.11. The annual compliance certification report required by Section VIII.B must contain a certification statement for the above applicable requirements (ARM 17.8.1212).

K. Thermal Oxidizer

EU153 – Thermal Oxidizer
EU153a – Thermal Oxidizer Scrubber Stack

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration Method	Compliance Demonstration Frequency	Reporting Requirements
K.1, K.7, K.12, K.17, K.18	LVHC-NCG and HVLC-NCG	Ducted to Thermal Oxidizer	Recordkeeping	Ongoing	Semi-annual
K.2, K.8, K.13, K.17, K.18	Combustion Chamber temperature	≥1600 °F	CMS	Daily Average	Semi-annual
		Continuously inouitor temp. Accurately to ± 1%	Audit monitor	Annually	Semi-annual
K.3, K.9, K.14, K.17, K.18	Steam Stripper Off-gas and Combined LVHC NCG and HVLC-NCG	Closed Vent Gas System Bypass Opening	Excess emissions not to Exceed 4%	Verify Valve Position Every 15 Minutes	Semi-annual
K.4, K.10, K.15, K.17, K.18	Combustion Chamber Residence Time	0.75 seconds	Parametric Monitoriug	Monthly	Semi-annual
K.5, K.11, K.16, K.17, K.18	Opacity	20%	Method 9	As Required by the Department and Section III.A.1	Semi-annual
K.6, K.11, K.16, K.17, K.18	Particulate Matter	0.10 gr/dscf Corrected to 10% O_2	Method 5	As Required by the Departmeut and Section III.A.1	Semi-annual

Conditions

K.1. LVHC-NCG and HVLC-NCG shall be routed to the Thermal Oxidizer for combustion of hazardous air pollutants and oxidation of reduced sulfur compounds. If the Thermal Oxidizer is unavailable, combustion of the LVHC-NCG in the No. 3 Lime Kiln will satisfy the HAP destruction requirements (ARM 17.8.1201(10)).

K.2. M2Green must operate a continuous temperature monitoring system accurate to +/- 1 percent in the combustion zone of the Thermal Oxidizer, and maintain on a daily average the Thermal Oxidizer combustion chamber temperature of at least 1,600 °F during the periods when the Thermal Oxidizer is used for combustion of the combined low-volume high concentration non-condensable gas (LVHC-NCG) and steam stripper off-gas (ARM 17.8.342, 40 CFR 63.443(d)(3), and ARM 17.8.321(3)).

K.3. M2Green shall limit bypass venting, from the combined LVHC-NCG, HVLC-NCG, and steam stripper off-gas, of the combustion system to 4% or less, excluding start-ups, shutdowns, and malfunctions (ARM 17.8.342 and 40 CFR 63.443(e)(3)).

K.4. M2Green must design and operate the Thermal Oxidizer combustion chamber with a minimum of 0.75 seconds residence time for treatment of the combined LVHC-NCG, HVLC-NCG, and steam stripper off-gas (ARM 17.8.342, 40 CFR 63.443(d)(3), and ARM 17.8.321(3)).

K.5. M2Green shall not cause or authorize to be discharged into the atmosphere, from the Thermal Oxidizer, any visible emissions that exhibit an opacity of 20% or greater (ARM 17.8.752).

K.6. M2Green shall not cause or authorize to be discharged into the atmosphere from the Thermal Oxidizer, any particulate matter emissions in excess of 0.10 gr/dscf corrected to 10% O_2 (ARM 17.8.752).

Compliance Demonstration

K.7. M2Green shall document, on a 15-minute basis, all instances that the gaseous emissions from the LVHC-NCG system is not ducted to either the Thermal Oxidizer or the No. 3 Lime Kiln and when the HVLC-NCG system is not ducted to the Thermal Oxidizer to monitor compliance with Section V.K.1 (ARM 17.8.1213).

K.8. Annually, M2Green shall audit the Thermal Oxidizer CMS temperature monitoring instrumentation to monitor compliance with Section V.K.2 (ARM 17.8.1213).

K.9. M2Green shall operate a CMS that will record the bypass vent valve position for the combined LVHC-NCG and steam stripper off gas (open or closed) at least every 15 minutes to monitor compliance with Section V.K.3 (ARM 17.8.342 and 40 CFR 63.450(d)).

K.10. The Thermal Oxidizer residence time shall be calculated using the designated parameters on a monthly basis (ARM 17.8.1213).

K.11. As required by the Department and Section III.A.1, M2Green shall conduct a Method 9 opacity test and a Method 5 source test on the Thermal Oxidizer to monitor compliance with the limitations contained in Section V.K.5 and K.6. These tests shall be conducted in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.105 and ARM 17.8.1213).

Recordkeeping

K.12. M2Green shall maintain the records required by Section V.K.7 on site and submit the information to the Department upon request (ARM 17.8.1212).

K.13. M2Green shall maintain CMS records of the daily average temperature in the combustion zone of the Thermal Oxidizer, and the annual temperature audit in accordance with 40 CFR 63, Subpart S, and shall submit them to the Department upon request (ARM 17.8.342, 40 CFR 63, Subpart S, and ARM 17.8.1212).

K.14. M2Green shall maintain the records of by-pass venting for the combined LVHC-NCG and steam stripper off gas, as required by Section V.K.3, and report the percent time of excess emissions, from the combined LVHC-NCG and steam stripper off gas, that the combustion system was bypassed, semi-annually to the Department as required by 40 CFR 63.10 (e)(vi) (ARM 17.8.342 and 40 CFR 63, Subpart S).

K.15. M2Green shall maintain a log of the calculation as required by Section V.K.10. The log shall include the parameter calculations, date, time, and reviewer's initials (ARM 17.8.1212).

K.16. All compliance source test recordkeeping shall be performed in accordance with the test method used, and shall be maintained on site. The reports must be submitted to the Department in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106 and ARM 17.8.1212).

Reporting

K.17. The semiannual monitoring report shall provide (ARM 17.8.1212):

a. A summary of results of the last source testing that was performed; and

b. The lowest daily average Thermal Oxidizer temperature and lowest thermal residence time during the period.

K.18. The annual compliance certification report required by Section VIII.B must contain a certification statement for the above applicable requirements (ARM 17.8.1212).

L. Natural Gas Boilers

EU024 – No. 1 Power Boiler

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration Method	Compliance Demonstration Frequency	Reporting Requirements
L.1, L.2, L.3, L.4, L.5	Opacity	40%	Method 9	As Required by the Department and Section III.A.1	Semi-annual

Conditions

L.1. M2Green shall not cause or authorize emissions from the No.1 Power Boiler to be discharged into the outdoor atmosphere that exhibit an opacity of 40% or greater averaged over 6 consecutive minutes (ARM 17.8.304(1)).

Compliance Demonstration

L.2. As required by the Department and Section III.A.1, M2Green shall perform a Method 9 test in accordance with the Montana Source Test Protocol and Procedures Manual. Each observation period shall be a minimum of 6 minutes unless any one reading is 40% or greater; then the observation period shall be a minimum of 20 minutes or until a violation of the standard has been documented, which ever is a shorter period of time (ARM 17.8.105 and ARM 17.8.1213).

Recordkeeping

L.3. All compliance source test recordkeeping shall be performed in accordance with the test method used, and shall be maintained on site. The reports must be submitted to the Department in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106 and ARM 17.8.1212).

Reporting

L.4. The semiannual monitoring report shall provide a summary of results of the last source testing that was performed (ARM 17.8.1212).

L.5. The annual compliance certification report required by Section VIII.B must contain a certification statement for the above applicable requirements (ARM 17.8.1212).

M. Miscellaneous Tanks/Vent

EU102(a-t) – Black Liquor Handling
EU119(a-e) – Quick Lime/Dry Lime Handling
EU127(a-b) – Tall Oil Reactor
EU131(a-j) – White Liquor Handling
EU107 - Chemical Storage Tanks

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration		Reporting Requirements
			Method	Frequency	
M.1, M.2, M.3, M.4, M.5	Opacity	20%	Method 9	As Required by the Department and Section III.A.1	Semi-annual

Conditions

M.1. M2Green shall not cause or authorize emissions from the Miscellaneous Tanks/Vents to be discharged into the outdoor atmosphere that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.304(2)).

Compliance Demonstration

M.2. As required by the Department and Section III.A.1, M2Green shall perform a Method 9 test in accordance with the Montana Source Test Protocol and Procedures Manual. Each observation period shall be a minimum of 6 minutes unless any one reading is 20% or greater; then the observation period shall be a minimum of 20 minutes or until a violation of the standard has been documented, which ever is a shorter period of time (ARM 17.8.105 and ARM 17.8.1213).

Recordkeeping

M.3. All compliance source test recordkeeping shall be performed in accordance with the test method used, and shall be maintained on site. The reports must be submitted to the Department in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106 and ARM 17.8.1212).

Reporting

M.4. The semiannual monitoring report shall provide a summary of results of the last source testing that was performed (ARM 17.8.1212).

M.5. The annual compliance certification report required by Section VIII.B must contain a certification statement for the above applicable requirements (ARM 17.8.1212).

N. Soda Ash System

EU040– Soda Ash System

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration Method	Compliance Demonstration Frequency	Reporting Requirements
N.1, N.4, N.7, N.9, N.10	Opacity	20%	Method 9	As Required by the Department and Section III.A.1	Semi-annual
N.2, N.5, N.8, N.9, N.10	PM/PM_{10}	Controlled with a bin vent dust collector	Recordkeeping	As Necessary	Semi-annual
N.3, N.6, N.7, N.9, N.10	PM/PM_{10}	0.02 gr/dscf	40 CFR Part 60, Appendix A 40 CFR Part 51, Appendix M	As required by the Department and Section III.A.1	Semi-annual

Conditions

N.1. M2Green shall not cause or authorize emissions from the Soda Ash System to be discharged into the outdoor atmosphere that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.304(2)).

N.2. PM/PM_{10} emissions from the soda ash storage silo and associated pneumatic truck unloading station shall be controlled with a bin vent dust collector (ARM 17.8.752).

N.3. PM/PM_{10} emissions from the soda ash storage silo and associated pneumatic truck unloading station shall not exceed 0.02 gr/dscf (ARM 17.8.752).

Compliance Demonstration

N.4. As required by the Department and Section III.A.1, M2Green shall perform a Method 9 test in accordance with the Montana Source Test Protocol and Procedures Manual. Each observation period shall be a minimum of 6 minutes unless any one reading is 20% or greater; then the observation period shall be a minimum of 20 minutes or until a violation of the standard has been documented, which ever is a shorter period of time (ARM 17.8.105 and ARM 17.8.1213).

N.5. M2Green shall monitor compliance with Section V.N.2 by documenting all maintenance activities on soda ash storage silo bin vent dust collector. The records must include, but are not limited to, the date, time, and action(s) taken for repair and maintenance (ARM 17.8.1213).

N.6. As required by the Department and Section III.A.1, monitoring compliance with Section V.N.3 shall be accomplished by EPA source sampling methods specified in 40 CFR Part 60, Appendix A. PM_{10} sampling methods are specified by 40 CFR Part 51, Appendix M. Total particulate results may be used as a surrogate for PM_{10} if the impinger analysis ("back-half") is included (ARM 17.8.1213).

Recordkeeping

N.7. All compliance source test recordkeeping shall be performed in accordance with the test method used, and shall be maintained on site. The reports must be submitted to the Department in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106 and ARM 17.8.1212).

N.8. M2Green shall maintain the records required by Section V.N.5 on site and submit the information to the Department upon request (ARM 17.8.1212).

Reporting

N.9. The semiannual monitoring report shall provide a summary of results of the last source testing that was performed (ARM 17.8.1212).

N.10. The annual compliance certification report required by Section VIII.B must contain a certification statement for the above applicable requirements (ARM 17.8.1212).

SECTION VI. PERMIT CONDITIONS - PAPER MILL DEPARTMENT, ENVIRONMENTAL AND TECHNICAL DEPARTMENT, ENGINEERING AND MAINTENANCE DEPARTMENT

A. Paper Machines

EU030 - No. 1 Paper Machine Wet End
EU031 - No. 1 Paper Machine Dryer
EU032 - No. 2 Paper Machine Wet End
EU033 - No. 2 Paper Machine Dryer
EU034 – No. 3 Paper Machine Wet End
EU035 - No. 3 Paper Machine Dryer
EU037 – Starch Handling
EU038 – Clay Handling

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration Method	Compliance Demonstration Frequency	Reporting Requirements
A.1, A.5, A.8, A.11, A.12	No.1 and no.2 Paper Machine Opacity	40%	Method 9	As Required by the Department and Section III.A.1	Semi-annual
A.2, A.5, A.8, A.11, A.12	No. 3 Paper Machine, Starch Handling, Clay Handling, and Salt Cake/Lime Handling Opacity	20%			
A.3, A.6, A.9, A.11, A.12	No. 3 Paper Machine Production	481,000 Tons ADP/ 12-Month Rolling Period	Maintain a Log	Monthly Calculations	Semi-annual
A.4, A.7, A.10, A.11, A.12	Starch Handling & Clay Handling,	Operate and Maintain Baghouses	Recordkeeping	Monthly	Semi-annual

Conditions

A.1. M2Green shall not cause or authorize emissions from the No. 1 and No. 2 Paper Machines to be discharged into the outdoor atmosphere that exhibit an opacity of 40% or greater averaged over 6 consecutive minutes (ARM 17.8.304(1)).

A.2. M2Green shall not cause or authorize emissions from the No. 3 Paper Machine, Starch handling, Clay handling, and Salt cake/Lime handling to be discharged into the outdoor atmosphere that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.304(2)).

A.3. The yearly production from the No. 3 Paper Machine shall be limited to 481,000 tons of air-dried finished product (i.e. liner board) during any rolling 12-month period. This limit includes pulp input from the pulp mill, as well as other sources (i.e., the OCC plant) (ARM 17.8.1201(10)).

A.4. M2Green shall operate and maintain baghouses on the starch handling and the clay handling (ARM 17.8.1201(10)).

Compliance Demonstration

A.5. As required by the Department and Section III.A.1, M2Green shall perform a Method 9 test in accordance with the Montana Source Test Protocol and Procedures Manual to monitor compliance with Section VI.A.1 and A.2. Each observation period shall be a minimum of 6 minutes unless any one reading is 40% or 20%, as applicable, or greater; then the observation period shall be a minimum of 20 minutes or until a violation of the standard has been documented, which ever is a shorter period of time (ARM 17.8.105 and ARM 17.8.1213).

A.6. M2Green shall document by month, the total production of the No. 3 Paper Machine. By the 25th day of each month, M2Green shall total the production of the No. 3 Paper Machine for the previous month. The monthly information will be used to verify compliance with the rolling 12-month limitation in Section VI.A.3 (ARM 17.8.1213).

A.7. M2Green shall monitor compliance with Section VI.A.4 by documenting all maintenance activities on the starch and clay baghouses. The records must include, but are not limited to, the date, time, and action(s) taken for repair and maintenance (ARM 17.8.1213).

Recordkeeping

A.8. All compliance source test recordkeeping shall be performed in accordance with the test method used, and shall be maintained on site. The reports must be submitted to the Department in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106 and ARM 17.8.1212).

A.9. The production log required by Section VI.A.6 shall be maintained on site and submitted to the Department upon request (ARM 17.8.1212).

A.10. M2Green shall maintain the records required by Section VI.A.7 on site and submit the information to the Department upon request (ARM 17.8.1212).

Reporting

A.11. The semiannual monitoring report shall provide (ARM 17.8.1212):

a. A summary of results of the last source testing that was performed; and

b. The monthly total production and the highest 12-month rolling total production from the No. 3 Paper Machine during the period.

A.12. The annual compliance certification report required by Section VIII.B must contain a certification statement for the above applicable requirements (ARM 17.8.1212).

B. EU130 – Effluent Treatment System

EU130a- Paper Mill Raw Post Consumer Effluent Vent
EU130b - Sludge Holding Tank
EU130c - Sludge Press
EU130d - Sludge Press Building Vent
EU130e - Sludge Storage Ponds
EU130f - Primary Clarifier
EU130g - Aeration Basin No. 1
EU130h - Aeration Basin No. 2
EU130i- Aeration Basin No. 3
EU130j - Treated Effluent Ponds
EU130k - Polishing Ponds

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration Method	Compliance Demonstration Frequency	Reporting Requirements
B.1, B.2, B.3, B.4, B.5	Effluent Treatment System Opacity	20%	Method 9	As Required by the Department and Section III.A.1	Semi-annual

Conditions

B.1. M2Green shall not cause or authorize emissions from the Effluent Treatment System to be discharged into the outdoor atmosphere that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.304(2)).

Compliance Demonstration

B.2. As required by the Department and Section III.A.1, M2Green shall perform a Method 9 test in accordance with the Montana Source Test Protocol and Procedures Manual. Each observation period shall be a minimum of 6 minutes unless any one reading is 20% or greater; then the observation period shall be a minimum of 20 minutes or until a violation of the standard has been documented, whichever is a shorter period of time (ARM 17.8.105 and ARM 17.8.1213).

Recordkeeping

B.3. All compliance source test recordkeeping shall be performed in accordance with the test method used, and shall be maintained on site. The reports must be submitted to the Department in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106 and ARM 17.8.1212).

Reporting

B.4. The semiannual monitoring report shall provide a summary of results of the last source testing that was performed (ARM 17.8.1212).

B.5. The annual compliance certification report required by Section VIII.B must contain a certification statement for the above applicable requirements (ARM 17.8.1212).

C. EU120 – Roads, Unpaved

EU120 – Unpaved Road Fugitives

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration Method	Compliance Demonstration Frequency	Reporting Requirements
C.1, C.2, C.3, C.4, C.5	Fugitive Emissions	Reasonable Precautions	Maintain a Log of Corrective Actions	As Necessary	Semi-annual

Conditions

C.1. M2Green shall not cause or authorize the use of any street, road or parking lot without taking reasonable precautions to control emissions of airborne particulate matter (ARM 17.8.308(2)).

Compliance Demonstration

C.2. M2Green shall use reasonable precautions to control fugitive emissions and maintain a log of any actions taken (ARM 17.8.1213).

Recordkeeping

C.3. M2Green shall maintain the log, on site, of any corrective action taken to control fugitive emissions (ARM 17.8.1212).

Reporting

C.4. The semiannual monitoring report shall include a summary of any corrective actions taken (ARM 17.8.1212).

C.5. The annual compliance certification report required by Section VIII.B must contain a certification statement for the above applicable requirements (ARM 17.8.1212).

D. Liquid Fuel Handling

EU111 – Liquid Fuel Handling

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration Method	Compliance Demonstration Frequency	Reporting Requirements
D.1, D.2, D.3, D.4, D.5	Liquid Fuel Handling Opacity	20%	Method 9	As Required by the Department and Section III.A.1	Semi-annual

Conditions

D.1. M2Green shall not cause or authorize emissions from the Liquid Fuel Handling to be discharged into the outdoor atmosphere that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.304(2)).

Compliance Demonstration

D.2. As required by the Department and Section III.A.1, M2Green shall perform a Method 9 test in accordance with the Montana Source Test Protocol and Procedures Manual. Each observation period shall be a minimum of 6 minutes unless any one reading is 20% or greater; then the observation period shall be a minimum of 20 minutes or until a violation of the standard has been documented, which ever is a shorter period of time (ARM 17.8.105 and ARM 17.8.1213).

Recordkeeping

D.3. All compliance source test recordkeeping shall be performed in accordance with the test method used, and shall be maintained on site. The reports must be submitted to the Department in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106 and ARM 17.8.1212).

Reporting

D.4. The semiannual monitoring report shall provide a summary of results of the last source testing that was performed (ARM 17.8.1212).

D.5. The annual compliance certification report required by Section VIII.B must contain a certification statement for the above applicable requirements (ARM 17.8.1212).

E. EU152 – CFC Recycling

EU152 – CFC Recycling – Freon Recycling

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration Method	Compliance Demonstration Frequency	Reporting Requirements
E.1, E.6, E.7, E.8, E.9	Appliance or Industrial Process Refrigeration Equipment	No Venting CFCs and HCFCs	Compliance in Accordance w/ 40 CFR Part 82	As Necessary	Semi-annual
E.2, E.6, E.7, E.8, E.9	Equipment Manufactured After November 15, 1993 Prior to November 15, 1993	EPA Approved Testing org. Stds in Table 3 of 40 CFR 82.158(c)			
E.3, E.6, E.7, E.8, E.9	Equipment	Repair Leaks and Develop Plan			
E.4, E.6, E.7, E.8, E.9	Equipment Servicing and Refrigerant Purchases for Equipment	Maintain Records if >50 lb of CFC			
E.5, E.6, E.7, E.8, E.9	Mandatory Recycling Technician Certification	Maintain			

Conditions

E.1. M2Green shall not intentionally vent chlorofluorocarbons (CFCs) and hydro-chlorofluorocarbons (HCFCs) used as refrigerants when maintaining, servicing, repairing, or disposing of an appliance or industrial process refrigeration equipment (40 CFR 82.154; EPA-Enforceable Only).

E.2. Recycling equipment manufactured after November 15, 1993, must be tested by an EPA-approved testing organization. Recycling equipment manufactured prior to November 15, 1993, shall meet the standards specified in Table 3 of §82.158(c) (40 CFR 82.158; EPA-Enforceable Only).

E.3. M2Green shall repair substantial leaks in accordance with 40 CFR Part 82 or develop a 1-year equipment retrofit or retirement plan for leaking equipment (40 CFR 82.156 and 166; EPA-Enforceable Only).

E.4. M2Green shall keep records of equipment servicing and refrigerant purchases for equipment holding more than 50 lb of CFC (40 CFR 82.166(k); EPA-Enforceable Only).

E.5. M2Green shall comply with the mandatory recycling technician certification (40 CFR 82.161; EPA-Enforceable Only).

Compliance Demonstration

E.6. M2Green shall monitor compliance in accordance with 40 CFR Part 82 (40 CFR Part 82; EPA-Enforceable Only).

Recordkeeping

E.7. M2Green shall maintain records in accordance with 40 CFR Part 82 and submit the records to the Department upon request (40 CFR Part 82; EPA-Enforceable Only).

Reporting

E.8. The semiannual monitoring report shall include any instances in which the leak rate for a unit holding more than 50 lbs of CFC exceeded 15% on an annual basis and the corrective action taken (ARM 17.8.1212).

E.9. The annual compliance certification report required by Section VIII.B must contain a certification statement for the above applicable requirements (ARM 17.8.1212).

SECTION VII. NON-APPLICABLE REQUIREMENTS

Air Quality Administrative Rules of Montana (ARM) and Federal Regulations identified as not applicable to the facility or to a specific emission unit at the time of the permit issuance are listed below (ARM 17.8.1214). The following list does not preclude the need to comply with any new requirements that may become applicable during the permit term.

Facility-Wide

The following table contains non-applicable requirements which are administrated by the Air Resources Management Bureau of the Department of Environmental Quality.

Rule Citation	Reason
40 CFR 60, Subparts C, Cb-Ce 40 CFR 60, Subparts E, Ea-Ec 40 CFR 60, Subparts F-Aaa 40 CFR 60, Subparts CC-WWW 40 CFR 61, Subpart B to L 40 CFR 61, Subpart N to FF 40 CFR 63, Subparts B to R 40 CFR 63, Subparts T to LL 40 CFR 63, Subpart NN to QQ 40 CFR 63, Subparts SS to JJJ 40 CFR 68	These requirements are not applicable because the facility is not an affected source as defined in these regulations.
40 CFR 82 ARM 17.8.316 ARM 17.8.320 ARM 17.8.326 ARM 17.8.330 ARM 17.8.323 ARM 17.8.324 ARM 17.8.331 ARM 17.8.332 ARM 17.8.333 ARM 17.8.334	These rules refer to a process, equipment, or activity that is not used at the facility.

Emission Units

The permit application identified applicable requirements: non-applicable requirements for individual or specific emission units were not listed. The Department has listed all non-applicable requirements in Section VIII.A; these requirements relate to each specific unit, as well as facility wide.

SECTION VIII. GENERAL PERMIT CONDITIONS

A. Compliance Requirements

ARM 17.8, Subchapter 12, Operating Permit Program §1210(2)(a)-(c)&(e), §1206(6)(c)&(b)

1. The permittee must comply with all conditions of the permit. Any noncompliance with the terms or conditions of the permit constitutes a violation of the Montana Clean Air Act, and may result in enforcement action, permit modification, revocation and reissuance, or termination, or denial of a permit renewal application under ARM Title 17, Chapter 8, Subchapter 12.

2. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

3. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. If appropriate, this factor may be considered as a mitigating factor in assessing a penalty for noncompliance with an applicable requirement if the source demonstrates that both the health, safety or environmental impacts of halting or reducing operations would be more serious than the impacts of continuing operations, and that such health, safety or environmental impacts were unforeseeable and could not have otherwise been avoided.

4. The permittee shall furnish to the Department, within a reasonable time set by the Department (not to be less than 15 days), any information that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit, or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Department copies of those records that are required to be kept pursuant to the terms of the permit. This subsection does not impair or otherwise limit the right of the permittee to assert the confidentiality of the information requested by the Department, as provided in 75-2-105, MCA.

5. Any schedule of compliance for applicable requirements with which the source is not in compliance with at the time of permit issuance shall be supplemental to, and shall not sanction noncompliance with, the applicable requirements on which it was based.

6. For applicable requirements that will become effective during the permit term, the source shall meet such requirements on a timely basis unless a more detailed plan or schedule is required by the applicable requirement or the Department.

B. Certification Requirements

ARM 17.8, Subchapter 12, Operating Permit Program §1207 and §1213(7)(a)&(c)-(d)

1. Any application form, report, or compliance certification submitted pursuant to ARM Title 17, Chapter 8, Subchapter 12, shall contain certification by a responsible official of truth, accuracy and completeness. This certification and any other certification required under ARM Title 17, Chapter 8, Subchapter 12, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.

2. Compliance certifications shall be submitted by February 15 of each year, or more frequently if otherwise specified in an applicable requirement or elsewhere in the permit. Each certification must include the required information for the previous calendar year (i.e., January 1 – December 31).

3. Compliance certifications shall include the following:

   a. The identification of each term or condition of the permit that is the basis of the certification;

   b. The identification of the method(s) or other means used by the owner or operator for determining the status of compliance with each term and condition during the certification period, consistent with ARM 17.8.1212;

   c. The status of compliance with each term and condition for the period covered by the certification, *including whether compliance during the period was continuous or intermittent* (based on the method or means identified in ARM 17.8.1213(7)(c)(ii), as described above); and

   d. Such other facts as the Department may require to determine the compliance status of the source.

4. All compliance certifications must be submitted to the Environmental Protection Agency, as well as to the Department, at the addresses listed in the Notification Addresses Appendix of this permit.

C. Permit Shield
ARM 17.8, Subchapter 12, Operating Permit Program §1214(1)-(4)

1. The applicable requirements and non-federally enforceable requirements are included and specifically identified in this permit and the permit includes a precise summary of the requirements not applicable to the source. Compliance with the conditions of the permit shall be deemed compliance with any applicable requirements and any non-federally enforceable requirements as of the date of permit issuance.

2. The permit shield described in 1 above shall remain in effect during the appeal of any permit action (renewal, revision, reopening, or revocation and reissuance) to the Board of Environmental Review (Board), until such time as the Board renders its final decision.

3. Nothing in this permit alters or affects the following:

   a. The provisions of Sec. 7603 of the FCAA, including the authority of the administrator under that section;

   b. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;

   c. The applicable requirements of the Acid Rain Program, consistent with Sec. 7651g(a) of the FCAA;

   d. The ability of the administrator to obtain information from a source pursuant to Sec. 7414 of the FCAA;

   e. The ability of the Department to obtain information from a source pursuant to the Montana Clean Air Act, Title 75, Chapter 2, MCA;

   f. The emergency powers of the Department under the Montana Clean Air Act, Title 75, Chapter 2, MCA; and

g. The ability of the Department to establish or revise requirements for the use of reasonably available control technology (RACT) as defined in ARM Title 17, Chapter 8. However, if the inclusion of a RACT into the permit pursuant to ARM Title 17, Chapter 8, Subchapter 12, is appealed to the Board, the permit shield, as it applies to the source's existing permit, shall remain in effect until such time as the Board has rendered its final decision.

4. Nothing in this permit alters or affects the ability of the Department to take enforcement action for a violation of an applicable requirement or permit term demonstrated pursuant to ARM 17.8.106, Source Testing Protocol.

5. Pursuant to ARM 17.8.132, for the purpose of submitting a compliance certification, nothing in these rules shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether a source would have been in compliance. However, when compliance or noncompliance is demonstrated by a test or procedure provided by permit or other applicable requirements, the source shall then be presumed to be in compliance or noncompliance unless that presumption is overcome by other relevant credible evidence.

6. The permit shield will not extend to minor permit modifications or changes not requiring a permit revision (see Sections I & J).

7. The permit shield will extend to significant permit modifications and transfer or assignment of ownership (see Sections K & O).

D. Monitoring, Recordkeeping, and Reporting Requirements
ARM 17.8, Subchapter 12, Operating Permit Program §1212(2)&(3)

1. Unless otherwise provided in this permit, the permittee shall maintain compliance monitoring records that include the following information:

   a. The date, place as defined in the permit, and time of sampling or measurement;

   b. The date(s) analyses were performed;

   c. The company or entity that performed the analyses;

   d. The analytical techniques or methods used;

   e. The results of such analyses; and

   f. The operating conditions at the time of sampling or measurement.

2. The permittee shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. All monitoring data, support information, and required reports and summaries may be maintained in computerized form at the plant site if the information is made available to Department personnel upon request, which may be for either hard copies or computerized format. Strip-charts must be maintained in their original form at the plant site and shall be made available to Department personnel upon request.

3. The permittee shall submit to the Department, at the addresses located in the Notification Addresses Appendix of this permit, reports of any required monitoring by February 15 and August 15 of each year, or more frequently if otherwise specified in an applicable requirement or elsewhere in the permit. The monitoring report submitted on February 15 of each year must include the required monitoring information for the period of July 1 through December 31 of the previous year. The monitoring report submitted on August 15 of each year must include the required monitoring information for the period of January 1 through June 30 of the current year. All instances of deviations from the permit requirements must be clearly identified in such reports. All required reports must be certified by a responsible official, consistent with ARM 17.8.1207.

E. Prompt Deviation Reporting
ARM 17.8, Subchapter 12, Operating Permit Program §1212(3)(c)

The permittee shall promptly report deviations from permit requirements, including those attributable to upset conditions as defined in the permit, the probable cause of such deviations, and any corrective actions or preventive measures taken. To be considered prompt, deviations shall be reported to the Department within the following timeframes (unless otherwise specified in an applicable requirement):

1. For deviations which may result in emissions potentially in violation of permit limitations:

   a. An initial phone notification (or faxed or electronic notification) describing the incident within 24 hours (or the next business day) of discovery; and,

   b. A follow-up written, faxed, or electronic report within 30 days of discovery of the deviation that describes the probable cause of the reported deviation and any corrective actions or preventative measures taken.

2. For deviations attributable to malfunctions, deviations shall be reported to the Department in accordance with the malfunction reporting requirements under ARM 17.8.110; and

3. For all other deviations, deviations shall be reported to the Department via a written, faxed, or electronic report within 90 days of discovery (as determined through routine internal review by the permittee).

Prompt deviation reports do not need to be resubmitted with regular semiannual (or other routine) reports, but may be referenced by the date of submittal.

F. Emergency Provisions
ARM 17.8, Subchapter 12, Operating Permit Program §1201(13) and §1214(5), (6)&(8)

1. An "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation and causes the source to exceed a technology-based emission limitation under this permit due to the unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of reasonable preventive maintenance, careless or improper operation, or operator error.

2. An emergency constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the permittee demonstrates through properly signed, contemporaneous logs, or other relevant evidence, that:

a. An emergency occurred and the permittee can identify the cause(s) of the emergency;

b. The permitted facility was at the time being properly operated;

c. During the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in the permit; and

d. The permittee submitted notice of the emergency to the Department within 2 working days of the time when emission limitations were exceeded due to the emergency. This notice fulfills the requirements of ARM 17.8.1212(3)(c). This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

3. These emergency provisions are in addition to any emergency, malfunction or upset provision contained in any applicable requirement.

G. Inspection and Entry
ARM 17.8, Subchapter 12, Operating Permit Program §1213(3)&(4)

1. Upon presentation of credentials and other requirements as may be required by law, the permittee shall allow the Department, the administrator, or an authorized representative (including an authorized contractor acting as a representative of the Department or the administrator) to perform the following:

a. Enter the premises where a source required to obtain a permit is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;

b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;

c. Inspect at reasonable times any facilities, emission units, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and

d. As authorized by the Montana Clean Air Act and rules promulgated thereunder, sample or monitor, at reasonable times, any substances or parameters at any location for the purpose of assuring compliance with the permit or applicable requirements.

2. The permittee shall inform the inspector of all workplace safety rules or requirements at the time of inspection. This section shall not limit in any manner the Department's statutory right of entry and inspection as provided for in 75-2-403, MCA.

H. Fee Payment
ARM 17.8, Subchapter 12, Operating Permit Program §1210(2)(f) and ARM 17.8, Subchapter 5, Air Quality Permit Application, Operation, and Open Burning Fees §505(3)-(5) (STATE ONLY)

1. The permittee must pay application and operating fees, pursuant to ARM Title 17, Chapter 8, Subchapter 5.

2. Annually, the Department shall provide the permittee with written notice of the amount of the fee and the basis for the fee assessment. The air quality operation fee is due 30 days after receipt of the notice, unless the fee assessment is appealed pursuant to ARM 17.8.511. If any

portion of the fee is not appealed, that portion of the fee that is not appealed is due 30 days after receipt of the notice. Any remaining fee, which may be due after the completion of an appeal, is due immediately upon issuance of the Board's decision or upon completion of any judicial review of the Board's decision.

3. If the permittee fails to pay the required fee (or any required portion of an appealed fee) within 90 days of the due date of the fee, the Department may impose an additional assessment of 15% of the fee (or any required portion of an appealed fee) or $100, whichever is greater, plus interest on the fee (or any required portion of an appealed fee), computed at the interest rate established under 15-31-510(3), MCA.

I. Minor Permit Modifications
ARM 17.8, Subchapter 12, Operating Permit Program §1226(3)&(11)

1. An application for a minor permit modification need only address in detail those portions of the permit application that require revision, updating, supplementation, or deletion, and may reference any required information that has been previously submitted.

2. The permit shield under ARM 17.8.1214 will not extend to any minor modifications processed pursuant to ARM 17.8.1226.

J. Changes Not Requiring Permit Revision
ARM 17.8, Subchapter 12, Operating Permit Program §1224(1)-(3), (5)&(6)

1. The permittee is authorized to make changes within the facility as described below, provided the following conditions are met:

   a. The proposed changes do not require the permittee to obtain a Montana Air Quality Permit under ARM Title 17, Chapter 8, Subchapter 7;

   b. The proposed changes are not modifications under Title I of the FCAA, or as defined in ARM Title 17, Chapter 8, Subchapters 8, 9, or 10;

   c. The emissions resulting from the proposed changes do not exceed the emissions allowable under this permit, whether expressed as a rate of emissions or in total emissions;

   d. The proposed changes do not alter permit terms that are necessary to enforce applicable emission limitations on emission units covered by the permit; and

   e. The facility provides the administrator and the Department with written notification at least 7 days prior to making the proposed changes.

2. The permittee and the Department shall attach each notice provided pursuant to 1.e above to their respective copies of this permit.

3. Pursuant to the conditions above, the permittee is authorized to make Section 502(b)(10) changes, as defined in ARM 17.8.1201(30), without a permit revision. For each such change, the written notification required under 1.e above shall include a description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.

4. The permittee may make a change not specifically addressed or prohibited by the permit terms and conditions without requiring a permit revision, provided the following conditions are met:

   a. Each proposed change does not weaken the enforceability of any existing permit conditions;

   b. The Department has not objected to such change;

   c. Each proposed change meets all applicable requirements and does not violate any existing permit term or condition; and

   d. The permittee provides contemporaneous written notice to the Department and the administrator of each change that is above the level for insignificant emission units as defined in ARM 17.8.1201(22) and 17.8.1206(3), and the written notice describes each such change, including the date of the change, any change in emissions, pollutants emitted, and any applicable requirement that would apply as a result of the change.

5. The permit shield authorized by ARM 17.8.1214 shall not apply to changes made pursuant to ARM 17.8.1224(3) and (5), but is applicable to terms and conditions that allow for increases and decreases in emissions pursuant to ARM 17.8.1224(4).

K. Significant Permit Modifications
ARM 17.8, Subchapter 12, Operating Permit Program §1227(1), (3)&(4)

1. The modification procedures set forth in 2 below must be used for any application requesting a significant modification of this permit. Significant modifications include the following:

   a. Any permit modification that does not qualify as either a minor modification or as an administrative permit amendment;

   b. Every significant change in existing permit monitoring terms or conditions;

   c. Every relaxation of permit reporting or recordkeeping terms or conditions that limit the Department's ability to determine compliance with any applicable rule, consistent with the requirements of the rule; or

   d. Any other change determined by the Department to be significant.

2. Significant modifications shall meet all requirements of ARM Title 17, Chapter 8, including those for applications, public participation, and review by affected states and the administrator, as they apply to permit issuance and renewal, except that an application for a significant permit modification need only address in detail those portions of the permit application that require revision, updating, supplementation or deletion.

3. The permit shield provided for in ARM 17.8.1214 shall extend to significant modifications.

L. Reopening for Cause
ARM 17.8, Subchapter 12, Operating Permit Program §1228(1)&(2)

This permit may be reopened and revised under the following circumstances:

1. Additional applicable requirements under the FCAA become applicable to the facility when the permit has a remaining term of 3 or more years. Reopening and revision of the permit shall be completed not later than 18 months after promulgation of the applicable requirement. No reopening is required under ARM 17.8.1228(1)(a) if the effective date of the applicable

requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms or conditions have been extended pursuant to ARM 17.8.1220(12) or 17.8.1221(2);

2. Additional requirements (including excess emission requirements) become applicable to an affected source under the Acid Rain Program. Upon approval by the administrator, excess emission offset plans shall be deemed incorporated into the permit;

3. The Department or the administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emission standards or other terms or conditions of the permit; or

4. The administrator or the Department determines that the permit must be revised or revoked and reissued to ensure compliance with the applicable requirements.

M. Permit Expiration and Renewal

ARM 17.8, Subchapter 12, Operating Permit Program §1210(2)(g), §1220(11)&(12), and §1205(2)(d)

1. This permit is issued for a fixed term of 5 years.

2. Renewal of this permit is subject to the same procedural requirements that apply to permit issuance, including those for application, content, public participation, and affected state and administrator review.

3. Expiration of this permit terminates the permittee's right to operate unless a timely and administratively complete renewal application has been submitted consistent with ARM 17.8.1221 and 17.8.1205(2)(d). If a timely and administratively complete application has been submitted, all terms and conditions of the permit, including the application shield, remain in effect after the permit expires until the permit renewal has been issued or denied.

4. For renewal, the permittee shall submit a complete air quality operating permit application to the Department not later than 6 months prior to the expiration of this permit, unless otherwise specified. If necessary to ensure that the terms of the existing permit will not lapse before renewal, the Department may specify, in writing to the permittee, a longer time period for submission of the renewal application. Such written notification must be provided at least 1 year before the renewal application due date established in the existing permit.

N. Severability Clause

ARM 17.8, Subchapter 12, Operating Permit Program §1210(2)(i)&(l)

1. The administrative appeal or subsequent judicial review of the issuance by the Department of an initial permit under this subchapter shall not impair in any manner the underlying applicability of all applicable requirements, and such requirements continue to apply as if a final permit decision had not been reached by the Department.

2. If any provision of a permit is found to be invalid, all valid parts that are severable from the invalid part remain in effect. If a provision of a permit is invalid in one or more of its applications, the provision remains in effect in all valid applications that are severable from the invalid applications.

O. Transfer or Assignment of Ownership
ARM 17.8, Subchapter 12, Operating Permit Program §1225(2)&(4)

1. If an administrative permit amendment involves a change in ownership or operational control, the applicant must include in its request to the Department a written agreement containing a specific date for the transfer of permit responsibility, coverage and liability between the current and new permittee.

2. The permit shield provided for in ARM17.8.1214 shall not extend to administrative permit amendments.

P. Emissions Trading, Marketable Permits, Economic Incentives
ARM 17.8, Subchapter 12, Operating Permit Program §1226(2)

Notwithstanding ARM 17.8.1226(1) and (7), minor air quality operating permit modification procedures may be used for permit modifications involving the use of economic incentives, marketable permits, emissions trading, and other similar approaches, to the extent that such minor permit modification procedures are explicitly provided for in the Montana State Implementation Plan or in applicable requirements promulgated by the administrator.

Q. No Property Rights Conveyed
ARM 17.8, Subchapter 12, Operating Permit Program §1210(2)(d)

This permit does not convey any property rights of any sort, or any exclusive privilege.

R. Testing Requirements
ARM 17.8, Subchapter 1, General Provisions §105

The permittee shall comply with ARM 17.8.105.

S. Source Testing Protocol
ARM 17.8, Subchapter 1, General Provisions §106

The permittee shall comply with ARM 17.8.106.

T. Malfunctions
ARM 17.8, Subchapter 1, General Provisions §110

The permittee shall comply with ARM 17.8.110.

U. Circumvention
ARM 17.8, Subchapter 1, General Provisions §111

The permittee shall comply with ARM 17.8.111.

V. Motor Vehicles
ARM 17.8, Subchapter 3, Emission Standards §325

The permittee shall comply with ARM 17.8.325.

W. Annual Emissions Inventory

ARM 17.8, Subchapter 5, Air Quality Permit Application, Operation and Open Burning Fees §505 (STATE ONLY)

The permittee shall supply the Department with annual production and other information for all emission units necessary to calculate actual or estimated actual amount of air pollutants emitted during each calendar year. Information shall be gathered on a calendar-year basis and submitted to the Department by the date required in the emission inventory request, unless otherwise specified in this permit. Information shall be in the units required by the Department.

X. Open Burning

ARM 17.8, Subchapter 6, Open Burning §604, 605 and 606

The permittee shall comply with ARM 17.8.604, 605 and 606.

Y. Montana Air Quality Permits

ARM 17.8, Subchapter 7, Permit, Construction and Operation of Air Contaminant Sources §745 and 764 (ARM 17.8.745(1) and 764(1)(b) are STATE ENFORCEABLE ONLY until approval by the EPA as part of the SIP)

1. Except as specified, no person shall construct, install, modify or use any air contaminant source or stack associated with any source without first obtaining a permit from the Department or Board. A permit is not required for those sources or stacks as specified by ARM 17.8.744(1)(a)-(k).

2. The permittee shall comply with ARM 17.8.743, 744, 745, 748, and 764.

3. ARM 17.8.745(1) specifies de minimis changes as construction or changed conditions of operation at a facility holding a Montana Air Quality Permit (MAQP) issued under Chapter 8 that does not increase the facility's potential to emit by more than 5 tons per year of any pollutant, except (STATE ENFORCEABLE ONLY until approved by the EPA as part of the SIP):

   a. Any construction or changed condition that would violate any condition in the facility's existing MAQP or any applicable rule contained in Chapter 8 is prohibited, except as provided in ARM 17.8.745(2);

   b. Any construction or changed conditions of operation that would qualify as a major modification under Subchapters 8, 9 or 10 of Chapter 8;

   c. Any construction or changed condition of operation that would affect the plume rise or dispersion characteristic of emissions that would cause or contribute to a violation of an ambient air quality standard or ambient air increment as defined in ARM 17.8.804;

   d. Any construction or improvement project with a potential to emit more than 5 tons per year may not be artificially split into smaller projects to avoid Montana Air Quality Permitting; or

   e. Emission reductions obtained through offsetting within a facility are not included when determining the potential emission increase from construction or changed conditions of operation, unless such reductions are made federally enforceable.

4. Any facility making a de minimis change pursuant to ARM 17.8.745(1) shall notify the Department if the change would include a change in control equipment, stack height, stack diameter, stack gas temperature, source location or fuel specifications, or would result in an increase in source capacity above its permitted operation or the addition of a new emission unit. The notice must be submitted, in writing, 10 days prior to start up or use of the proposed de minimis change, or as soon as reasonably practicable in the event of an unanticipated circumstance causing the de minimis change, and must include the information requested in ARM 17.8.745(1) (STATE ENFORCEABLE ONLY until approval by the EPA as part of the SIP).

Z. National Emission Standard for Asbestos
40 CFR, Part 61, Subpart M

The permittee shall not conduct any asbestos abatement activities except in accordance with 40 CFR 61, Subpart M (National Emission Standard for Hazardous Air Pollutants for Asbestos).

AA. Asbestos
ARM 17.74, Subchapter 3, General Provisions and Subchapter 4, Fees

The permittee shall comply with ARM 17.74.301, *et seq.*, and ARM 17.74.401, *et seq.* (State only)

BB. Stratospheric Ozone Protection – Servicing of Motor Vehicle Air Conditioners
40 CFR, Part 82, Subpart B

If the permittee performs a service on motor vehicles and this service involves ozone-depleting substance/refrigerant in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR 82, Subpart B.

CC. Stratospheric Ozone Protection – Recycling and Emission Reductions
40 CFR, Part 82, Subpart F

The permittee shall comply with the standards for recycling and emission reductions in 40 CFR 82, Subpart F, except as provided for MVACs in Subpart B:

1. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156;

2. Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158;

3. Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technical certification program pursuant to §82.161;

4. Persons disposing of small appliances, MVACs and MVAC-like (as defined at §82.152) appliances must comply with recordkeeping requirements pursuant to §82.166;

5. Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to §82.156; and

6. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.

DD. Emergency Episode Plan

The permittee shall comply with the requirements contained in Chapter 9.7 of the State of Montana Air Quality Control Implementation Plan.

Each major source emitting 100 tons per year located in a Priority I Air Quality Control Region, shall submit to the Department a legally enforceable Emergency Episode Action Plan (EEAP) that details how the source will curtail emissions during an air pollutant emergency episode. The industrial EEAP shall be in accordance with the Department's EEAP and shall be submitted according to a timetable developed by the Department, following Priority I reclassification.

EE. Definitions

Terms not otherwise defined in this permit or in the Definitions and Abbreviations Appendix of this permit, shall have the meaning assigned to them in the referenced regulations.

APPENDICES

APPENDIX A INSIGNIFICANT EMISSION UNITS

Disclaimer: The information in this appendix is not State or Federally enforceable, but is presented to assist M2Green, the permitting authority, inspectors, and the public.

Pursuant to ARM 17.8.1201(22)(a), an insignificant emissions unit means any activity or emission unit located within a source that: (i) has a potential to emit less than 5 tons per year of any regulated pollutant; (ii) has a potential to emit less than 500 pounds per year of lead; (iii) has a potential to emit less than 500 pounds per year of hazardous air pollutants listed pursuant to Sec. 7412 (b) of the FCAA; and (iv) is not regulated by an applicable requirement, other than a generally applicable requirement that applies to all emission units subject to Subchapter 12.

List of Insignificant Activities:

The following table of insignificant sources and/or activities was provided by M2Green. Because there are no requirements to update such a list, the emission units and/or activities may change from those specified in the table.

Emission Unit ID	Description
IEU01	Chip Fines to Hog Fuel (& Sawdust Fines)
IEU02	Shower Water Tank Stack
IEU03	Black Liquor Charge Tank
IEU04	Liquor Filter Vent
IEU05	No. 1 Filtrate Tank Vent (SD Filtrate)
IEU06	No. 4 Evaporator Feed Tank
IEU07	Spill Tank in Batch Area
IEU08	Pins Kamyr Low Pressure Feeder Relief Cyclone
IEU09	M&D Digester Chip Feeder Vent
IEU10	Kamyr Chip Bin Vent
IEU11	Recycled Fiber Bale Storage
IEU12	Turpentine Storage Tank
IEU13	No. 5 Recovery Building Roof Steam Vents
IEU14	Coke Storage Tank
IEU15	No.6 Fuel Oil Tank
IEU16	Dregs Wash Tank
IEU17	No. 1 Green Liquor Clarifier Tank Vents
IEU18	No. 1 Green Liquor Storage Tank Vents
IEU19	No. 2 Green Liquor Clarifier Tank Vents
IEU20	Raw Green Liquor Storage Tank Vent
IEU21	No. 3 Mud Washer Tank Vents
IEU22	No. 1 Mud Washer Tank Vents
IEU23	No. 1 & No. 2 Mud Filter Hood
IEU24	No. 1 Mud Storage Tank – Serves No. 1 & No. 2 Lime Kilns
IEU25	No. 2 Mud Washer Tank Vent
IEU26	No. 2 Mud Storage Tank
IEU27	No. 3 Kiln Mud Filter Hood
IEU28	No. 3 Lime Kiln Mud Filter Vacuum Pump Exhaust Stack
IEU29	No. 3 Mud Storage Tank Vents
IEU30	No. 4 Lime Kiln Mud Filter Hood
IEU31	No. 4 Lime Kiln Mud Filter Vacuum Pump Exhaust Stack
IEU32	Warehouse/Shipping Dock Roof Vents
IEU33	Diesel Tank Vent
IEU34	Gasoline Tank Vent
IEU35	Paved Road Fugitives

APPENDIX B DEFINITIONS and ABBREVIATIONS

"Act" means the Clean Air Act, as amended, 42 U.S. 7401, *et seq.*

"Administrative permit amendment" means an air quality operating permit revision that:

(a) Corrects typographical errors;

(b) Identifies a change in the name, address or phone number of any person identified in the air quality operating permit, or identifies a similar minor administrative change at the source;

(c) Requires more frequent monitoring or reporting by M2Green;

(d) Requires changes in monitoring or reporting requirements that the Department deems to be no less stringent than current monitoring or reporting requirements;

(e) Allows for a change in ownership or operational control of a source if the Department has determined that no other change in the air quality operating permit is necessary, consistent with ARM 17.8.1225; or

(f) Incorporates any other type of change which the Department has determined to be similar to those revisions set forth in (a)-(e), above.

"Applicable requirement" means all of the following as they apply to emission units in a source requiring an air quality operating permit (including requirements that have been promulgated or approved by the Department or the administrator through rule making at the time of issuance of the air quality operating permit, but have future-effective compliance dates, provided that such requirements apply to sources covered under the operating permit):

(a) Any standard, rule, or other requirement, including any requirement contained in a consent decree or judicial or administrative order entered into or issued by the Department, that is contained in the Montana state implementation plan approved or promulgated by the administrator through rule making under Title I of the FCAA;

(b) Any federally enforceable term, condition or other requirement of any air quality preconstruction permit issued by the Department under Subchapters 7, 8, 9 and 10 of this chapter, or pursuant to regulations approved or promulgated through rule making under Title I of the FCAA, including Parts C and D;

(c) Any standard or other requirement under Sec. 7411 of the FCAA, including Sec. 7411(d);

(d) Any standard or other requirement under Sec. 7412 of the FCAA, including any requirement concerning accident prevention under Sec. 7412(r)(7), but excluding the contents of any risk management plan required under Sec. 7412(r);

(e) Any standard or other requirement of the acid rain program under Title IV of the FCAA or regulations promulgated thereunder;

(f) Any requirements established pursuant to Sec. 7661c(b) or Sec. 7414(a)(3) of the FCAA;

(g) Any standard or other requirement governing solid waste incineration, under Sec. 7429 of the FCAA;

(h) Any standard or other requirement for consumer and commercial products, under Sec. 7511b(e) of the FCAA;

(i) Any standard or other requirement for tank vessels, under Sec. 7511b(f) of the FCAA;

(j) Any standard or other requirement of the regulations promulgated to protect stratospheric ozone under Title VI of the FCAA, unless the administrator determines that such requirements need not be contained in an air quality operating permit;

(k) Any national ambient air quality standard or increment or visibility requirement under Part C of Title I of the FCAA, but only as it would apply to temporary sources permitted pursuant to Sec. 7661c(e) of the FCAA; or

(l) Any federally enforceable term or condition of any air quality open burning permit issued by the Department under Subchapter 6.

"Department" means the Montana Department of Environmental Quality.

"Emissions unit" means any part or activity of a stationary source that emits or has the potential to emit any regulated air pollutant or any pollutant listed under Sec. 7412(b) of the FCAA. This term is not meant to alter or affect the definition of the term "unit" for purposes of Title IV of the FCAA.

"FCAA" means the Federal Clean Air Act, as amended.

"Federally enforceable" means all limitations and conditions which are enforceable by the administrator, including those requirements developed pursuant to 40 CFR Parts 60 and 61, requirements within the Montana state implementation plan, and any permit requirement established pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR Part 51, Subpart I, including operating permits issued under an EPA approved program that is incorporated into the Montana state implementation plan and expressly requires adherence to any permit issued under such program.

"Fugitive emissions" means those emissions which could not reasonably pass through a stack, chimney, vent, or other functionally equivalent opening.

"General air quality operating permit" or **"general permit"** means an air quality operating permit that meets the requirements of ARM 17.8.1222, covers multiple sources in a source category, and is issued in lieu of individual permits being issued to each source.

"Hazardous air pollutant" means any air pollutant listed as a hazardous air pollutant pursuant to Sec. 112(b) of the FCAA.

"Mill Day" means the 24-hr period from 5:00 am to 5:00 am.

"Non-federally enforceable requirement" means the following as they apply to emission units in a source requiring an air quality operating permit:

(a) Any standard, rule, or other requirement, including any requirement contained in a consent decree, or judicial or administrative order entered into or issued by the Department, that is not contained in the Montana state implementation plan approved or promulgated by the administrator through rule making under Title I of the FCAA;

(b) Any term, condition or other requirement contained in any air quality preconstruction permit issued by the Department under Subchapters 7, 8, 9 and 10 of this chapter that is not federally enforceable;

(c) Does not include any Montana ambient air quality standard contained in Subchapter 2 of this chapter.

"Permittee" means the owner or operator of any source subject to the permitting requirements of this subchapter, as provided in ARM 17.8.1204, that holds a valid air quality operating permit or has submitted a timely and complete permit application for issuance, renewal, amendment, or modification pursuant to this subchapter.

"Regulated air pollutant" means the following:

(a) Nitrogen oxides or any volatile organic compounds;

(b) Any pollutant for which a national ambient air quality standard has been promulgated;

(c) Any pollutant that is subject to any standard promulgated under Sec. 7411 of the FCAA;

(d) Any Class I or II substance subject to a standard promulgated under or established by Title VI of the FCAA; or

(e) Any pollutant subject to a standard or other requirement established or promulgated under Sec. 7412 of the FCAA, including but not limited to the following:

(i) Any pollutant subject to requirements under Sec. 7412(j) of the FCAA. If the administrator fails to promulgate a standard by the date established in Sec. 7412(e) of the FCAA, any pollutant for which a subject source would be major shall be considered to be regulated on the date 18 months after the applicable date established in Sec. 7412(e) of the FCAA;

(ii) Any pollutant for which the requirements of Sec. 7412(g)(2) of the FCAA have been met but only with respect to the individual source subject to Sec. 7412(g)(2) requirement.

"Responsible official" means one of the following:

(a) For a corporation: a president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit and either:

(i) The facilities employ more than 250 persons or have gross annual sales or expenditures exceeding $25 million (in second quarter 1980 dollars); or

(ii) The delegation of authority to such representative is approved in advance by the Department.

(b) For a partnership or sole proprietorship: a general partner or the proprietor; respectively.

(c) For a municipality, state, federal, or other public agency: either a principal executive officer or ranking elected official. For the purposes of this part, a principal executive officer of a federal agency includes the chief executive officer having responsibility for the overall operations of a principal geographic unit of the agency (e.g., a regional administrator of the Environmental Protection Agency).

(d) For affected sources: the designated representative in so far as actions, standards, requirements, or prohibitions under Title IV of the FCAA or the regulations promulgated thereunder are concerned, and the designated representative for any other purposes under this subchapter.

Abbreviations:

ARM	Administrative Rules of Montana
ASTM	American Society of Testing Materials
BACT	Best Available Control Technology
BDT	bone dry tons
BTU	British Thermal Unit
CEMS	Continuous Emission Monitoring System
CFC	Chlorofluorocarbons
CFR	Code of Federal Regulations
CMS	Continuous Monitoring System
CO	carbon monoxide
COMS	Continuous Opacity Monitoring System
DEQ	Department of Environmental Quality
dscf	dry standard cubic foot
dscfm	dry standard cubic foot per minute
EEAP	Emergency Episode Action Plan
EER	Excess Emission Report
EPA	U.S. Environmental Protection Agency
EPA Method	Test methods contained in 40 CFR 60, Appendix A
ESP	Electrostatic Precipitator
EU	emission unit
FCAA	Federal Clean Air Act
gr	grains
HAP	hazardous air pollutant
HCFC	Hydro-Chlorofluorocarbons
IEU	insignificant emission unit
Mbdft	thousand Board feet
MCA	Montana Code Annotated
Method 5	40 CFR 60, Appendix A, Method 5
Method 9	40 CFR 60, Appendix A, Method 9
MMbdft	million Board feet
MMBTU	million British Thermal Units
NO_x	oxides of nitrogen
NO_2	nitrogen dioxide
NSPS	New Source Performance Standard
O_2	oxygen
OCC	Old Corrugated Container
ODP	Oven Dried Pulp
ODT	Oven Dried Ton
ORSAT	Name brand of the analyzer
Pb	lead
PM	particulate matter
PM_{10}	particulate matter less than 10 microns in size
psi	pounds per square inch
RACT	Reasonably Available Control Technology
scf	standard cubic feet
SIC	Source Industrial Classification
SO_2	sulfur dioxide
SO_x	oxides of sulfur
tpy	tons per year
TRS	Total Reduced Sulfur
U.S.C.	United States Code
VE	visible emissions
VOC	volatile organic compound

APPENDIX C NOTIFICATION ADDRESSES

Compliance Notifications:

Montana Department of Environmental Quality
Permitting and Compliance Division
Air Resources Management Bureau
P.O. Box 200901
Helena, MT 59620-0901

United States EPA
Air Program Coordinator
Region VIII, Montana Office
10 W. 15th Street, Suite 3200
Helena, MT 59626

Permit Modifications:

Montana Department of Environmental Quality
Permitting and Compliance Division
Air Resources Management Bureau
P.O. Box 200901
Helena, MT 59620-0901

Office of Partnerships and Regulatory Assistance
Air and Radiation Program
US EPA Region VIII 8P-AR
1595 Wynkoop Street
Denver, CO 80202-1129

APPENDIX D AIR QUALITY INSPECTOR INFORMATION

Disclaimer: The information in this appendix is not State or Federally enforceable but is presented to assist M2Green, permitting authority, inspectors, and the public.

Direction to Plant: The facility is located at 14377 Pulp Mill Road, Missoula, Montana. This is near Frenchtown, Montana, which is 10 miles northwest of Missoula.

Safety Equipment Required: While on site, safety glasses, steel toed shoes, and ear protection are required. A M2Green staff member will cover any other recommended safety instructions prior to entering the plant.

Facility Plot Plau: A copy of the facility plot plan is on file with the Department and was submitted with the application on June 7, 1996.

APPENDIX E COMPLIANCE ASSURANCE MONITORING (CAM) PLAN

EU011 No. 1 Lime Kiln – PM and PM_{10}

Applicable Regulations, Emission Limits, and Monitoring Requirements

Pollutant	Emission Limit	Control Technology
PM and PM_{10}	288 lbs/day 12.0 lbs/hr	Wet Venturi Scrubber

Current Monitoring Requirements: Continuous Parametric Monitoring of wet scrubber liquid flow rates and venturi differential pressure is required in accordance with 40 CFR 63 Subpart MM should the kiln be operated in the future.

CAM Monitoring

	Indicator No. 1 **Parametric Monitoring System (PMS)**	**Indicator No. 2** **Source Testing**
Measurement Approach	Monitor wet scrubber liquid flow rates and venturi differential pressure	
Indicator Range	Action level will be any block 3-hour average scrubber liquid flow or venturi differential pressure outside of the target ranges established for MACT II compliance in accordance with 40 CFR 63 Subpart MM	Not Applicable
Corrective Action	Audible alarm sounds continuously until operations personnel respond to identify, correct and document any problem.	Not Applicable
Performance Criteria		
Collection of Representative Data	Scrubber liquid flow meters and differential pressure transmitters will be installed prior to future operation of the kiln.	A source test is a direct measurement of the particulate emissions. Testing equipment and protocols, calibration methods and frequencies, and analytical methods comply with 40 CFR Part 60, Appendix A.
QA/QC Practices and Criteria	Regularly scheduled audits and preventative maintenance will be performed on the flow meters and differential pressure transmitters.	Included in source test protocol
Monitoring Frequency	Flow rates and differential pressures will be monitored continuously	Annual
Data Collection Procedure	15-minute, 1-hour and 3-hour averages will be calculated using the mill's PI data historian and programmed Environmental Reporting System	Source test reports submitted to Montana DEQ.
Averaging Period	Block three-hour averages	In accordance with EPA Method 5

M2G 100104

EU012 No. 2 Lime Kiln -PM and PM_{10}

Applicable Regulations, Emission Limits, and Monitoring Requirements

Pollutant	Emission Limit	Control Technology
PM and PM_{10}	266 lbs/day 11.08 lbs/hr	Wet Venturi Scrubber

Current Monitoring Requirements: Continuous Parametric Monitoring of wet scrubber liquid flow rates and venturi differential pressure is required in accordance with 40 CFR 63 Subpart MM should the kiln be operated in the future.

CAM Monitoring

	Indicator No. 1	**Indicator No. 2**
	Parametric Monitoring System (PMS)	**Source Testing**
Measurement Approach	Monitor wet scrubber liquid flow rates and venturi differential pressure	
Indicator Range	Action level will be any block 3-hour average scrubber liquid flow or venturi differential pressure outside of the target ranges established for MACT II compliance in accordance with 40 CFR 63, Subpart MM	Not Applicable
Corrective Action	Audible alarm sounds continuously until operations personnel respond to identify, correct and document any problem.	Not Applicable
Performance Criteria		
Collection of Representative Data	Scrubber liquid flow meters and differential pressure transmitters will be installed prior to future operation of the kiln.	A source test is a direct measurement of the particulate emissions. Testing equipment and protocols, calibration methods and frequencies, and analytical methods comply with 40 CFR 60 Appendix A.
QA/QC Practices and Criteria	Regularly scheduled audits and preventative maintenance will be performed on the flow meters and differential pressure transmitters.	Included in source test protocol
Monitoring Frequency	Flow rates and differential pressures will be monitored continuously	Annual
Data Collection Procedure	15-minute, 1-hour and 3-hour averages will be calculated using the mill's PI data historian and programmed Environmental Reporting System	Source test reports submitted to Montana DEQ.
Averaging Period	Block three-hour averages	In accordance with EPA Method 5

M2G 100105

EU013 No. 3 Lime Kiln – PM and PM_{10}

Applicable Regulations, Emission Limits, and Monitoring Requirements

4Pollutant	Emission Limit	Control Technology
PM and PM_{10}	359 lbs/day 14.96 lbs/hour	Wet Venturi Scrubber

Current Monitoring Requirements: Continuous Parametric Monitoring of wet scrubber liquid flow rates and venturi differential pressure in accordance with 40 CFR 63 Subpart MM.

CAM Monitoring

	Indicator No. 1	**Indicator No. 2**
	Parametric Monitoring System (PMS)	**Source Testing**
Measurement Approach	Monitor wet scrubber liquid flow rates and venturi differential pressure	
Indicator Range	Action level will be any block 3-hour average scrubber liquid flow or venturi differential pressure outside of the target ranges established for MACT II compliance in accordance with 40 CFR 63, Subpart MM	Not Applicable
Corrective Action	Audible alarm sounds continuously until operations personnel respond to identify, correct and document any problem.	Not Applicable
Performance Criteria		
Collection of Representative Data	Scrubber liquid flow meters and differential pressure transmitters meeting the requirements of 40 CFR 63, Subpart MM are currently installed.	A source test is a direct measurement of the particulate emissions. Testing equipment and protocols, calibration methods and frequencies, and analytical methods comply with 40 CFR 60 Appendix A.
QA/QC Practices and Criteria	Regularly scheduled audits and preventative maintenance will be performed on the flow meters and differential pressure transmitters.	Included in source test protocol
Monitoring Frequency	Flow rates and differential pressures will be monitored continuously	Annual
Data Collection Procedure	15-minute, 1-hour and 3-hour averages will be calculated using the mill's PI data historian and programmed Environmental Reporting System	Source test reports submitted to Montana DEQ.
Averaging Period	Block three-hour averages	In accordance with EPA Method 5

M2G 100106

EU014 – No. 4 Lime Kiln – PM and PM_{10}

Applicable Regulations, Emission Limits, and Monitoring Requirements

40 CFR 60, Subpart BB – Standards of Performance for Kraft Pulp Mills

Pollutant	Emission Limit	Control Technology
PM and PM_{10}	204.0 lbs/day 8.50 lbs/hour	Wet Venturi Scrubber
PM	0.067 gr/dscf corrected to 10% O_2 (Subpart BB)	Wet Venturi Scrubber

Current Monitoring Requirements: Continuous Parametric Monitoring of wet scrubber liquid flow rates and venturi differential pressure in accordance with 40 CFR 63, Subpart MM.

CAM Monitoring

	Indicator No. 1 **Parametric Monitoring System (PMS)**	**Indicator No. 2** **Source Testing**
Measurement Approach	Monitor wet scrubber liquid flow rates and venturi differential pressure	Source testing for total particulate matter and PM_{10} in accordance with MAQP #2589-13
Indicator Range	Action level will be any block 3-hour average scrubber liquid flow or venturi differential pressure outside of the target ranges established for MACT II compliance in accordance with 40 CFR 63, Subpart MM	Not Applicable
Corrective Action	Audible alarm sounds until operations personnel respond to identify, correct and document any problem.	Not Applicable
Performance Criteria		
Collection of Representative Data	Scrubber liquid flow meters and differential pressure transmitters meeting the requirements of 40 CFR 63 Subpart MM are currently installed.	A source test is a direct measurement of the particulate emissions. Testing equipment and protocols, calibration methods and frequencies, and analytical methods comply with 40 CFR 60 Appendix A.
QA/QC Practices and Criteria	Regularly scheduled audits and preventative maintenance is performed on the flow meters and differential pressure transmitters.	Included in source test protocol
Monitoring Frequency	Flow rates and differential pressures are monitored continuously.	Annual
Data Collection Procedure	15-minute, 1-hour and 3-hour averages are calculated using the mill's PI data historian and programmed Environmental Reporting System	Source test reports submitted to Montana DEQ.
Averaging Period	Block three-hour averages	In accordance with EPA Method 5

M2G 100107

EU002 No. 4 Recovery Boiler – PM and PM_{10}

Applicable Regulations, Emission Limits, and Monitoring Requirements

Pollutant	Emission Limit	Control Technology
PM and PM_{10}	1253 lbs/day 52.21 lbs/hour	Dry Electrostatic Precipitator

Monitoring Requirements: Continuous Opacity Monitoring System (COMS), Annual Source Testing for Particulate Matter

CAM Monitoring

	Indicator No. 1	**Indicator No. 2**
	Opacity	**Source Testing**
Measurement Approach	Monitor stack opacity using COMS.	
Indicator Range	Action level will be any 1-hour block average opacity of 20% or greater	Not Applicable
Corrective Action	Audible alarm sounds continuously until operations personnel respond to identify, correct and document any problem.	Not Applicable
Performance Criteria		
Collection of Representative Data	The monitoring shall be continuous collecting a reading every 10 seconds to calculate and record each 6-minute average 6-minute averages are then used to calculate a block 1-hour average opacity	A source test is a direct measurement of the particulate emissions. Testing equipment and protocols, calibration methods and frequencies, and analytical methods comply with 40 CFR 60 Appendix A.
QA/QC Practices and Criteria	Daily zero/span checks, quarterly audits, and annual zero calibrations performed to ensure proper operation	Included in source test protocol
Monitoring Frequency	Measured continuously, sampled @ 10-sec intervals.	Annual
Data Collection Procedure	Six-minute opacity averages calculated by CEMS Data Acquisition System, 1-hour block averages calculated and recorded via the mill's PI data historian	Source test reports submitted to Montana DEQ.
Averaging Period	One hour	In accordance with EPA Method 5

M2G 100108

EU003 No. 5 Recovery Boiler – PM and PM_{10}

Note: The No. 5 Recovery Boiler CAM Plan is only applicable when this unit is used for chemical recovery. It is not applicable when the unit is fired solely on natural gas.

Applicable Regulations, Emission Limits, and Monitoring Requirements

40 CFR 60, Subpart BB – Standards of Performance for Kraft Pulp Mills

Pollutant	Emission Limit	Control Technology
PM and PM_{10}	633.6 lbs/day 26.4 lbs/hour	Dry Electrostatic Precipitator
PM	0.044 gr/dscf corrected to 8% O_2	Dry Electrostatic Precipitator

Monitoring Requirements: Continuous Opacity Monitoring System (COMS), Annual Source Testing for Particulate Matter

CAM Monitoring

	Indicator No. 1 **Opacity**	**Indicator No. 2** **Source Testing**
Measurement Approach	Monitor stack opacity using COMS.	
Indicator Range	Action level will be any 1-hour block average opacity of 20% or greater	Not Applicable
Corrective Action	Audible alarm sounds continuously until operations personnel respond to identify, correct and document any problem.	Not Applicable
Performance Criteria		
Collection of Representative Data	The monitoring shall be continuous collecting a reading every 10 seconds to calculate and record each 6-minute average. 6-minute averages will then be used to calculate a block 1-hour average opacity.	A source test is a direct measurement of the particulate emissions. Testing equipment and protocols, calibration methods and frequencies, and analytical methods comply with 40 CFR 60 Appendix A.
QA/QC Practices and Criteria	Daily zero/span checks, quarterly audits, and annual zero calibrations performed to ensure proper operation	Included in source test protocol
Monitoring Frequency	Measured continuously, sampled @ 10-sec intervals.	Annual
Data Collection Procedure	Six-minute opacity averages calculated by CEMS Data Acquisition System, 1-hour block averages calculated and recorded via the mill's PI data historian	Source test reports submitted to Montana DEQ.
Averaging Period	One hour	In accordance with EPA Method 5

M2G 100109

EU016 No. 4 Smelt Dissolving Tank PM and PM_{10}

Applicable Regulations, Emission Limits, and Monitoring Requirements

Pollutant	Emission Limit	Control Technology
PM and PM_{10}	607 lbs/day 25.29 lbs/hour	Wet Venturi Scrubber

Current Monitoring Requirements: Continuous Parametric Monitoring of wet scrubber liquid flow rates and venturi differential pressure in accordance with 40 CFR 63, Subpart MM

CAM Monitoring

	Indicator No. 1 **Parametric Monitoring System (PMS)**	**Indicator No. 2** **Source Testing**
Measurement Approach	Monitor wet scrubber liquid flow rates and venturi differential pressure	
Indicator Range	Action level will be any block 3-hour average scrubber liquid flow or venturi differential pressure outside of the target ranges established for MACT II compliance in accordance with 40 CFR 63 Subpart MM	Not Applicable
Corrective Action	Audible alarm sounds until operations personnel respond to identify, correct and document any problem.	Not Applicable
Performance Criteria		
Collection of Representative Data	Scrubber liquid flow meters and differential pressure transmitters meeting the requirements of 40 CFR 63 Subpart MM are currently installed.	A source test is a direct measurement of the particulate emissions. Testing equipment and protocols, calibration methods and frequencies, and analytical methods comply with 40 CFR 60 Appendix A.
QA/QC Practices and Criteria	Regularly scheduled audits and preventative maintenance is performed on the flow meters and differential pressure transmitters.	Included in source test protocol
Monitoring Frequency	Flow rates and differential pressures are monitored continuously.	Annual
Data Collection Procedure	15-minute, 1-hour and 3-hour averages are calculated using the mill's PI data historian and programmed Environmental Reporting System	Source test reports submitted to Montana DEQ.
Averaging Period	Block three-hour averages	In accordance with EPA Method 5

M2G 100110

EU017 No. 5 Smelt Dissolving Tank PM and PM_{10}

Applicable Regulations, Emission Limits, and Monitoring Requirements

Pollutant	Emission Limit	Control Technology
PM and PM_{10}	120 lbs/day 5.0 lbs/hour	Wet Scrubber

Monitoring Requirements: Continuous Parametric Monitoring of wet scrubber liquid flow rates and venturi differential pressure in accordance with 40 CFR 63, Subpart MM

CAM Monitoring

	Indicator No. 1 **Parametric Monitoring System (PMS)**	**Indicator No. 2** **Source Testing**
Measurement Approach	Monitor wet scrubber liquid flow rates and venturi differential pressure	
Indicator Range	Action level will be any block 3-hour average scrubber liquid flow or venturi differential pressure outside of the target ranges established for MACT II compliance in accordance with 40 CFR 63 Subpart MM	Not Applicable
Corrective Action	Audible alarm sounds until operations personnel respond to identify, correct and document any problem.	Not Applicable
Performance Criteria		
Collection of Representative Data	Scrubber alternative CMS as approved by the department will be installed prior to firing Black Liquor in this boiler.	A source test is a direct measurement of the particulate emissions. Testing equipment and protocols, calibration methods and frequencies, and analytical methods comply with 40 CFR 60 Appendix A.
QA/QC Practices and Criteria	Regularly scheduled audits and preventative maintenance is performed on the flow meters and differential pressure transmitters.	Included in source test protocol
Monitoring Frequency	Flow rates and differential pressures are monitored continuously.	Annual
Data Collection Procedure	15-minute, 1-hour and 3-hour averages are calculated using the mill's PI data historian and programmed Environmental Reporting System	Source test reports submitted to Montana DEQ.
Averaging Period	Block three-hour averages	In accordance with EPA Method 5

M2G 100111

EU021 Multi Fuel Boiler PM

Requirements of this section shall become applicable 180 days after the effective date of the Operating Permit #OP2589-06 (ARM 17.8.1508(4)).

Applicable Regulations, Emission Limits, and Monitoring Requirements

40 CFR 60, Subpart D

Pollutant	Emission Limit	Control Technology
PM	0.1 lb/MMBTU 1249lbs/day 52.04lbs/hour	Two (2) parallel Wet Venturi Scrubber

Current Monitoring Requirements: Semi-Annual Source Testing for Particulate Matter

CAM Monitoring

	Indicator No. 1	**Indicator No. 2**
	Scrubber Liquid Flow and Venturi Differential Pressure	**Source Testing**
Measurement Approach	Monitor scrubber liquid flow and differential pressure (D/P) at least once every 15 minutes.	
Indicator Range	Action level will be any block 3-hour average scrubber liquid flow or, block 3-hour average venturi differential pressure less of less than the target value determined in accordance with procedures approved by the Department.	Not Applicable
Corrective Action	Audible alarm sounds until operations personnel respond to identify, correct and document any problem.	Not Applicable
Performance Criteria		
Collection of Representative Data	Scrubber liquid flow meters and differential pressure transmitters meeting the requirements of 40 CFR 63, Subpart MM will be installed.	A source test is a direct measurement of the particulate emissions. Testing equipment and protocols, calibration methods and frequencies, and analytical methods comply with 40 CFR 60 Appendix A.
QA/QC Practices and Criteria	Preventative Maintenance and calibrations of the Scrubber Liquid Flow and Differential Pressure monitors will be performed in accordance with mill standard procedures	Included in source test protocol
Monitoring Frequency	Measured at least once every 15 minutes and averaged over a block 3-hour period.	Semi-Annual
Data Collection Procedure	Scrubbing Liquid Flow and Differential Pressure will be recorded via the mill's PI data historian	Source test reports submitted to Montana DEQ.
Averaging Period	Block 3-hour Period	In accordance with EPA Method 5

M2G 100112

APPENDIX F AMBIENT AIR MONITORING PLAN – State-Only

1. This ambient air monitoring plan is required by Air Quality Permit #OP2589-06, which applies to M2Green's Kraft pulp mill operation located approximately 10 miles northwest of Missoula, Montana. The Department may modify the requirements of this monitoring plan. All requirements of this plan are considered state-only enforceable conditions of the permit.

2. M2Green shall operate and maintain two air monitoring sites in the vicinity of the mill and facilities. The exact locations of the monitoring sites must be approved by the Department and meet all the siting requirements contained in the Montana Quality Assurance Manual, including revisions; the EPA Quality Assurance Manual, including revisions; and 40 Code of Federal Regulations (CFR) Part 58; or any other requirements specified by the Department.

3. Within 30 days prior to any changes of the location of the ambient monitors, M2Green shall submit a topographic map to the Department identifying UTM coordinates, air monitoring site locations in relation to the facility, and the general area present.

4. M2Green shall continue air monitoring for at least 2 years after installation of the monitor described in Section 2 above. The Department will review the air monitoring data and the Department will determine if continued monitoring or additional monitoring is warranted. The Department may require continued air monitoring to track long-term impacts of emissions from the facility or require additional ambient air monitoring or analyses if any changes take place in regard to quality and/or quantity of emissions or the area of impact from the emissions.

5. M2Green shall monitor the following parameters at the sites and frequencies described below:

AIRS # and Site Name	UTM Coordinates	Code & Parameter	Frequency
30-063-0034 Moccasin Lane #1A	Zone 11 N 520 3200 E 719 000	42402 H_2S[1]	Continuous
		61101 Wind Speed and Direction	Continuous
		61106 Standard Deviation of Wind Direction (sigma theta)	Continuous
30-063-0022 Site #2A	Zone 11 N 520 8155 E 712 395	42402 H_2S	Continuous

[1] H_2S = hydrogen sulfide.

6. Data recovery for all parameters shall be at least 80% computed on a quarterly and annual basis. The Department may require continued monitoring if this condition is not met. (Data Recovery = (Number of data points collected in evaluation period)/(number of scheduled data points in evaluation period)*(100%))

7. Any ambient air monitoring changes proposed by M2Green must be approved, in writing, by the Department.

8. M2Green shall utilize air monitoring and Quality Assurance (QA) procedures that are equal to or exceed the requirements described in the Montana Quality Assurance Manual, including revisions; the EPA Quality Assurance Manual, including revisions; 40 CFR Parts 50 and 58; and any other requirements specified by the Department.

9. M2Green shall submit two hard copies of quarterly data reports within 45 days after the end of the calendar quarter and two hard copies of the annual data report within 90 days after the end of the calendar year.

10. The quarterly data submittals shall consist of a hard copy narrative data summary and a digital submittal of all data points in AIRS batch code format. The electronic data must be submitted to the Air Monitoring Section as digital text files readable by an office PC with a Windows operating system.

    The narrative data hard copy summary must be submitted to the Air Compliance Section and shall include:

    a. A hard copy of the individual data points,

    b. The first and second highest hourly concentrations for H_2S at each site,

    c. The quarterly and monthly wind roses,

    d. A summary of the data completeness,

    e. A summary of the reasons for missing data,

    f. A precision data summary,

    g. A summary of any ambient air standard exceedances, and

    h. QA/QC information such as zero/span/precision, calibration, audit forms, and standards certifications.

11. The annual data report shall consist of a narrative data summary. The narrative data hard copy summary must be submitted to the Air Compliance Section and shall include:

    a. A topographic map of appropriate scale with UTM coordinates and a true north arrow showing the air monitoring site locations in relation to the mill and facilities and the general area,

    b. The year's ten highest hourly concentrations for H_2S at each site,

    c. The annual wind rose,

    d. A summary of any ambient air standard exceedances, and

    e. An annual summary of data completeness.

12. All records compiled in accordance with this Attachment must be maintained by M2Green as a permanent business record for at least 5 years following the date of the measurement, must be available at the plant site for inspection by the Department, and must be submitted to the Department upon request (ARM 17.8.749).

13. The Department may audit (or may require M2Green to contract with an independent firm to audit) the air monitoring network, the laboratory performing associated analysis, and any data handling procedures at unspecified times.

14. The hard copy reports should be sent to:
Department of Environmental Quality
Attention: Air Compliance Section Supervisor

15. The electronic data from the quarterly monitoring shall be sent to:
Department of Environmental Quality
Attention: Air Monitoring Section Supervisor

Montana Department of
ENVIRONMENTAL QUALITY
Brian Schweitzer, Governor
P. O. Box 200901 Helena, MT 59620-0901 (406) 444-2544 Website: www.deq.mt.gov

July 15, 2011

Mark Spizzo
M2Green Redevelopment, LLC
c/o Green Investment Group, Inc.
601 E. Third Street, Suite 302
P.O. Box 249
Alton, Illinois 62002

Dear Mr. Spizzo:

Montana Air Quality Permit #2589-16 is deemed final as of July 15, 2011, by the Department of Environmental Quality (Department). This permit is for a kraft pulp mill. All conditions of the Department's Decision remain the same. Enclosed is a copy of your permit with the final date indicated.

For the Department,

Vickie Walsh

Vickie Walsh
Air Permitting Program Supervisor
Air Resources Management Bureau
(406) 444-9741

Julie A. Merkel

Julie A. Merkel
Air Quality Specialist
Air Resources Management Bureau
(406) 444-3626

VW:JM
Enclosure

MONTANA AIR QUALITY PERMIT

Issued to: M2Green Redevelopment, LLC
P.O. Box 249
Alton, Illinois 62002

Montana Air Quality Permit #2589-16
Administrative Amendment (AA)
Requests Received: 06/10/11
Department Decision on AA: 06/29/11
Permit Final: 7/15/11
AFS#: 063-0006

A Montana Air Quality Permit (MAQP), with conditions, is hereby granted to the M2Green Redevelopment, LLC ("M2Green") pursuant to Sections 75-2-204 and 211 of the Montana Code Annotated (MCA), as amended, and Administrative Rules of Montana (ARM) 17.8.740, *et seq.*, as amended, for the following:

SECTION I: Permitted Facilities

A. Facility/Location

The M2Green kraft pulp and liner mill is located in Frenchtown, Montana. A list of permitted equipment can be found below.

1. Two Recovery Boilers

a. #4 Recovery Boiler has a capacity of 825 million British thermal units per hour (MMBtu/hr) input and is controlled with an electrostatic precipitator. The #4 Recovery Boiler has continuous emission monitors (CEMs) for total reduced sulfur (TRS), required by state permit.

b. #5 Recovery Boiler has a capacity of 330 MMBtu/hr input and is controlled with an electrostatic precipitator. This boiler is subject to New Source Performance Standards (NSPS, 40 Code of Federal Regulations (CFR) Part 60) and has CEMs for opacity and TRS. The #5 Recovery Boiler is subject to 40 CFR 60, Subpart BB.

2. Four Lime Kilns

a. #1 Lime Kiln has a capacity of 6.1 tons per hour of lime mud and is controlled with a wet venturi scrubber. The kiln has a CEM for TRS. The #1 Lime Kiln is currently curtailed as it does not meet the Maximum Achievable Control Technology (MACT) II requirements specified in 40 CFR 63, Subpart MM. The requirements of 40 CFR Part 63 must be met prior to restarting this equipment.

b. #2 Lime Kiln has a capacity of 6.1 tons per hour of lime mud and is controlled with a wet venturi scrubber. The kiln has a CEM for TRS. The #2 Lime Kiln is currently curtailed as it does not meet the MACT II requirements specified in 40 CFR 63, Subpart MM. The requirements of 40 CFR Part 63 must be met prior to restarting this equipment.

c. #3 Lime Kiln has a capacity of 15.6 tons per hour of lime mud and is controlled with a wet venturi scrubber. The kiln has a CEM for TRS.

d. #4 Lime Kiln has a capacity of 12.7 tons per hour of lime mud and is controlled with a wet venturi scrubber. The kiln has a CEM for TRS. This lime kiln is subject to 40 CFR 60, Subpart BB.

3. Two Dissolving Tanks

a. #4 Smelt Dissolving Tank has a capacity of 62.5 tons per hour of black liquor solids. This dissolver is controlled with a wet scrubber and a venturi scrubber.

b. #5 Smelt Dissolving Tank has a capacity of 25 tons per hour of black liquor solids. This dissolver is controlled with a wet scrubber and is subject to 40 CFR 60, Subpart BB.

4. Three Lime Slakers

a. The #1 Lime Slaker is designed to accept a maximum green liquor flow of 400 gallons per minute (gpm). This slaker is controlled with a wet scrubber.

b. The #2 Lime Slaker is designed to accept a maximum green liquor flow of 550 gpm. This slaker is controlled with a natural draft wet scrubber.

c. The #3 Lime Slaker is designed to accept a maximum green liquor flow of 500 gpm. This slaker is controlled with a wet scrubber.

5. One Multi-fuel Boiler

This boiler is primarily fueled with wood residuals (other allowable fuels include natural gas, medium density fiberboard (MDF) pellets, old cardboard container (OCC) rejects, sludge, fuel oil and recycled oil). It has an input capacity of 537 MMBtu/hr. The boiler is controlled with two wet venturi scrubbers, operated in parallel. The boiler is subject to 40 CFR 60, Subpart D and has CEMs for both oxides of nitrogen (NO_x) and sulfur dioxide (SO_2).

6. One Natural Gas-Fired Boiler (Power Boiler)

This boiler is fired only with natural gas and has a capacity of 297 MMBtu/hr. This boiler has no emission control on the stack.

7. Five Pulp Washers

a. The PC Washer has a capacity of 20.2 tons per hour of air-dried pulp (ADP). This washer is controlled by a wet scrubber. The PC Washer is currently curtailed as it does not meet the MACT I, Phase II requirements specified in 40 CFR 63, Subpart S. The requirements of 40 CFR Part 63 must be met prior to restarting this equipment.

b. The M&D Washer has a capacity of 17.2 tons per hour of ADP. This washer is a compaction baffle-type washer with no particulate emissions. The M&D Washer is currently curtailed as it does not meet the MACT I, Phase II requirements specified in 40 CFR 63, Subpart S. The requirements of 40 CFR Part 63 must be met prior to restarting this equipment.

c. The #1 Base Washer has a capacity of 38.6 tons per hour of ADP. Particulate emissions from this washer are controlled by the internal washer hood design.

d. The #2 Base Washer has a capacity of 38.6 tons per hour of ADP. Particulate emissions from this washer are controlled by the internal washer hood design.

e. The Top Washer has a capacity of 25.5 tons per hour of ADP. Particulate emissions from this washer are controlled by the internal washer hood design.

8. Three Paper Machines

a. #1 Paper Machine has a capacity of 29.5 tons per hour of ADP. There is no control on the paper machine ventilation.

b. #2 Paper Machine has a capacity of 29.5 tons per hour of ADP. There is no control on the paper machine ventilation.

c. #3 Paper Machine has a capacity of 59.6 tons per hour of ADP. There is no control on the paper machine ventilation.

9. Three Unloading Stations

a. Salt Cake/Lime Unloading has a capacity of 20.0 tons per hour and is controlled with a baghouse.

b. Starch Unloading has a capacity of 7.5 tons per hour and is controlled with a baghouse.

c. Clay Unloading has a capacity of 13.0 tons per hour and is controlled with a baghouse.

10. Sawdust, Chip, and Hog Fuel Unloading

a. #1 Dump (also called #5 Truck Dump) is used to unload trucks only and uses a belt system to convey chips and sawdust to the stockpiles. The sawdust conveyor shall be controlled by a hood and skirt at the end of the conveyor to limit the free drop height to a maximum of 10 feet.

The length of the skirting will be determined at the time the hood and skirt are installed.

A mechanism to allow for an inspector to measure the drop height must be provided at all times when sawdust is being processed.

b. #2 Dump is used to unload trucks only and uses a conveyor belt to convey chips to the stockpiles.

c. #3 Dump is a combination truck or rail dump that conveys chips and sawdust, using a belt system, to the stockpiles. The sawdust conveyor shall be controlled by a hood and skirt at the end of the conveyor to limit the free drop height to a maximum of 10 feet.

A mechanism to allow for an inspector to measure the drop height must be provided at all times.

d. Waste Fuel Combination Dumper is a combination truck or rail dump that conveys hog fuel by belt conveyor to the stockpiles or the scalping screen.

11. Sawdust, Chip, and Hog Fuel Handling

a. Sawdust is removed from storage using a screw reclaimer and disc scalping screen and conveyed to the digester with a pneumatic system and no other control.

b. Chips are removed from storage using hoppers and plate feeders or a drag chain and conveyed to the digesters with covered conveyers and no other control.

c. Hog fuel is removed from storage by a screw reclaimer and conveyed to the boilers with covered conveyer belts and no other control.

12. Sawdust and Chip Cyclones

a. M&D Cyclone delivers sawdust to the M&D Digester.

13. Fiber Optimization and Raw Material Management System (FORMM) -- Screen Room

a. Nine gyratory screens and four disk screens will be used to separate sawdust and chips into overs, accept chips, pin chips, accept sawdust, fines, and hog fuel.

b. The FORMM System also contains a storage bin, a storage bin unloading system, and an enclosed belt conveying system.

c. Four air density separator (ADS) slicers will slice useable chips to acceptable thickness with a maximum rated capacity of 68,160 bone-dry lb/hour of chips per slicer. The limitations of the equipment installed with the slicers will limit the production of the slicers to 42,720 bone-dry lb/hour of chips per slicer.

The material to the slicers will have been screened. The transfer of the material to the slicers will be controlled by four ADS cyclones (one for each slicer).

d. A Micro-Pulsaire baghouse will be installed to control nuisance dust in the screen room. The cyclone for the sawdust in-feed will be connected to the baghouse.

14. Out-feed Systems Equipment

a. Kamyr chips shall be conveyed by covered belt conveyor to the Kamyr chip pile and no other controls.

b. Batch chips shall be conveyed by covered belt conveyor to the batch pile and no other controls.

c. The sawdust shall be fed from the surge bin into a new pneumatic conveying system that connects to the existing sawdust blow line and no controls. The sawdust blow line is existing.

d. Fines from the chip screen and the sawdust screen shall be sent by a pneumatic conveying system to the hog fuel pile. These emissions will be controlled by a target plate and bunker at the end of the discharge pipe.

e. ADS rejects shall be conveyed by belt conveyor to a truck or lugger bucket and transferred to the hog fuel pile by truck and no other controls.

f. Sawdust overs to the chip pile shall be conveyed by a belt conveyor that discharges into a pneumatic system, which transfers the material to a cyclone discharging onto the chip pile outstocking belt conveyor. The outstocking belt conveyor transfers the chips to the chip stockpile. M2Green shall install and maintain a weightometer on the sawdust overs belt to be used to determine the quantity of sawdust overs handled.

15. Sludge Dewatering Facility

Dewatered sludge from this facility is used as a fuel for the existing multi-fuel boiler. The rated output from the facility is 60 tons per day.

16. Soda Ash Silo

Soda ash is used as a make-up chemical in the pulping process. The soda ash storage silo has a capacity of 300 tons and includes an associated pneumatic truck unloading station and mixing equipment to mix dry soda ash into a solution suitable for addition to the green liquor.

17. Other Equipment

Miscellaneous scales, gates, screens, blower, etc., as described in the drawings and the equipment list submitted with the application.

18. Cluster Rule Maximum Achievable Control Technology (MACT) I Pollution Control Project

The Missoula Mill is classified as an unbleached Kraft pulp and paper mill following the discontinuation of bleaching operations at the mill during February 1999. Due to the fact that the Missoula Mill no longer operates a pulp bleaching system and has taken key bleach plant equipment out of service, the Cluster Rule standards for air emissions and effluent discharges related to the bleaching of pulp are not applicable to the Missoula Mill. The rule currently applicable to the Missoula Mill is 40 CFR 63, Subpart S (commonly referred to as "MACT I"). The Missoula Mill has installed and is operating the equipment described below to comply with the MACT I requirements.

a. Condensate Collection

The mill's condensate segregation system, which was installed and operating prior to the MACT I pollution control project involving digester and evaporator system condensates, has been modified to comply with the MACT I condensate segregation requirements. To comply with MACT I requirements, condensate segregation and collection continues to occur on selected portions of evaporation and concentrator systems, Chip Kamyr digester systems, and NCG system drains. A new condensate collection tank has been installed for storage of the segregated high-hazardous air pollutant (HAP) condensate prior to treatment. The mill has decommissioned the air stripper formerly used to treat collected condensate and replaced it with the steam stripper described below.

Depending on mill operations and equipment curtailments, condensate may be collected from any, or any combination, or the following sources: Nos. 1, 2, 3, 4, 5 Evaporators, Nos. 1 and 2 Concentrators, Turpentine Decanter, Batch Digester Blow Heat Recovery System, and the Low Volume, High Concentration (LVHC)-NCG Line Drains.

b. LVHC NCG Collection

To comply with the MACT I LVHC-NCG requirements, the mill modified its existing LVHC-NCG system, which has been operational since the early 1970's, to collect additional vents from the turpentine system, new foul condensate storage tank, selected portions of evaporator and concentrator systems including hotwells, a digester blow tank, a black liquor spill tank, and secondary and tertiary condensers on the batch blow heat recovery system, when operating.

c. Steam Stripper and Thermal Oxidizer

A new condensate steam stripper system has been installed at the Missoula Mill for treatment of the segregated high-HAP condensate. The condensate steam stripper system has been integrated with the mill's steam systems in order to most effectively use the steam required to operate the steam stripper system. The stripper overhead gas along with the LVHC-NCG is conveyed in a closed system to a new stand-alone thermal oxidizer designed to meet the MACT requirements for destruction of these gases.

Though not required by the MACT I requirements, the following process backup systems are currently being implemented should the new thermal oxidizer be unavailable:

- Modifications have been implemented to use No. 3 kiln for back-up combustion of the collected LVHC-NCG.

- When the steam stripper is down, the collected condensates are routed to the spill tank with the spill tank vent collected as part of the LVHC-NCG system. Condensate collected in the spill tank is processed through the mill's evaporator system.

d. High Volume Low Concentration (HVLC) NCG Collection

The HVLC-NCG system is specifically designed for the collection and treatment of gaseous HAPs and includes a HVLC gas booster fan and a HVLC gas fan. This equipment provides sufficient vacuum on the brown stock washers, filtrate tanks, and foam breaker tower for collection of HVLC-NCG from these sources and transport of the collected gases to the thermal oxidizer. After collection of the HVLC-NCG from these sources, the gases are combined into a single header and passed through a gas cooler (heat exchanger) using non-contact cooling water to cool and reduce the volume of gases.

B. Current Permit Action

On June 10, 2011, the Department of Environmental Quality (Department) received an administrative amendment request from Smurfit-Stone Container Corporation ("SSCC") to transfer all ownership of the Montana Air Quality Permit #2589 to M2Green Redevelopment LLC ("M2Green"). On May 3, 2011, SSCC sold the Missoula Mill to M2Green, and M2Green has agreed to assume the responsibility, coverage, and liability for the Montana Air Permits as of May 3, 2011. The Department has updated the MAQP to reflect these changes.

SECTION II: Conditions and Limitations

A. The results of any single emission test or daily average from the continuous opacity monitors shall be evaluated against the specified hourly and daily maximum. Emission tests shall be conducted according to the following schedules.

1. #4 and #5 Recovery Boilers shall have emissions testing performed for total suspended particulate (TSP) and particulate matter with an aerodynamic diameter of 10 microns or less (PM_{10}) annually (semiannually if measured emissions exceed 80% of the permit limit).

2. #4 Recovery Boiler shall have emissions testing performed for total reduced sulfur (TRS) once every two years.

3. #4 and #5 Smelt Dissolving Tanks shall have emissions testing performed for TSP and PM_{10} annually.

4. #1, #2, #3, and #4 Lime Kilns shall have emissions testing performed for TSP and PM_{10} once every 2 years.

5. #1, #2, and #3 Lime Kilns shall have emissions testing performed for TRS once every two years.

6. #1 Lime Slaker shall have emissions testing performed for TSP and PM_{10} annually.

7. The Multi-fuel Boiler shall have emissions testing performed for TSP and PM_{10} annually.

8. The Micro-Pulsair Baghouse shall have emissions testing performed for TSP and PM_{10} annually.

B. All source tests shall be conducted in accordance with the EPA sampling methods specified in 40 CFR 60, General Provisions, Appendix A; 40 CFR 51, Appendix M; and the Montana Source Test Protocol and Procedures Manual.

C. M2Green shall submit to the Department copies of all emission tests performed at M2Greenwithin 60 days of completion of each test or according to another reporting schedule as approved by the Department.

D. All source tests to be used to demonstrate compliance with the conditions and limitations of this permit shall be performed at conditions, which are representative of maximum operating capacity or maximum permitted capacity of the affected facility or source, as required in the Montana Source Test Protocol and Procedures Manual, except for the following situations:

1. M2Green shall test each recovery boiler annually for TSP and PM_{10} at 90% or greater of maximum-rated capacity. If the results from the annual testing are at 80% of the permit limitation or greater, then testing shall occur on a semiannual basis. If M2Green tests' results are below 80% of the permit limitations, then M2Green may return to annual testing no later than one year from the last test date. The maximum daily operation rate shall be determined based on daily black liquor firing rate.

2. M2Green shall test the Multi-fuel Boiler annually for total particulate and PM_{10} at 90% or greater of maximum daily average steam production rate achieved during the last three whole calendar months preceding the test. Daily average steam production shall be the average hourly steam production during a mill day (the 24-hour period from 5:00 am to 5:00 am).

3. M2Green shall report monthly the daily black liquor firing rate for each recovery boiler and the daily steam production for the Multi-fuel Boiler. This information shall be included with the monthly report.

E. If a process is not operating, no testing, monitoring, or reporting will be required for that process during that time period.

F. Individual Conditions for Sources:

1. #4 Recovery Boiler

a. TSP emissions from this boiler shall not exceed 0.044 grains per dry standard cubic foot (gr/dscf)corrected to 8% oxygen (O_2) concentration (ARM 17.8.342 and 40 CFR 63, Subpart MM) and, in no case, shall exceed 1253 lb/calendar day and 52.21 lb/hr.

b. PM_{10} emissions from this boiler shall not exceed 1253 lb/calendar day and 52.21 lb/hr.

c. Total sulfate emissions from this boiler shall not exceed 1253 lb/calendar day and 52.21 lb/hr.

d. TRS emissions from this boiler shall not exceed 5 parts per million (ppm), 24-hour average.

e. Compliance with the above Section II.F.1.a-d standards shall be demonstrated with EPA source sampling methods specified in 40 CFR 60, Appendix A, including back-half particulate, and by monitoring as described in 40 CFR 63.864 or as approved by the Administrator, as applicable. PM_{10} sampling methods are specified by 40 CFR 51, Appendix M, including back-half particulate. TSP results may be used as a surrogate for PM_{10} if the impinger analysis ("back-half") is included.

f. A CEM for TRS compounds is required for this source.

g. The monthly average TSP shall not exceed 928 lb/day. Monthly average emissions shall be monitored by continuous opacity monitoring. The opacity monitors will provide a 24-hour average opacity that will be converted to gr/dscf and then converted to lb/day and lb/month using the correlation between opacity and particulate emissions. M2Green shall maintain a correlation between opacity and particulate emissions (from stack test results) and use this correlation to calculate daily and monthly averages.

h. M2Green shall submit for approval, to the Department, any proposed changes to the correlation between opacity and particulate emissions equation.

i. M2Green shall not discharge into the outdoor atmosphere emissions that exhibit 20% opacity or greater averaged over 6 consecutive minutes for more than 6% of the 6-minute time periods during which M2Green is operating within a calendar quarter (ARM 17.8.321).

j. Compliance with Section II.F.1.i above shall be monitored with Continuous Opacity Monitoring System (COMS) as the primary measure of compliance with the opacity limit, except that 40 CFR 60, Appendix A, Method 9, may be used as a measure of compliance when there is reason to believe that COMS data is not accurate or when COMS data is unavailable (ARM 17.8.321(15)).

2. #5 Recovery Boiler (subject to 40 CFR 60, Subpart BB)

a. TSP emissions from this boiler shall not exceed 0.044 gr/dscf corrected to 8% O_2 concentration (ARM 17.8.340; 40 CFR 60, Subpart BB; ARM 17.8.342; and 40 CFR 63, Subpart MM) and, in no case, shall exceed 633.6 lb/day and 26.4 lb/hr.

b. PM_{10} emissions from this boiler shall not exceed 633.6 lb/day and 26.4 lb/hr.

c. Total sulfate emissions from this boiler shall not exceed 633.6 lb/day and 26.4 lb/hr.

d. TRS emissions from this boiler shall not exceed 5 ppm, 12-hour average.

e. Compliance with the above Section II.F.2.a-c standards shall be demonstrated with EPA source sampling methods specified in 40 CFR 60, Appendix A, and by monitoring as described in 40 CFR 63.864, as

applicable. Back-half is not required for TSP compliance demonstration since this is an NSPS source. PM_{10} sampling methods are specified by 40 CFR 51, Appendix M, including back-half particulate. TSP results may be used as a surrogate for PM_{10} if the impinger analysis ("back-half") is included. Compliance with Section II.F.2.d TRS emissions are determined by continuous monitoring methods specified in 40 CFR 60, Appendix B, Performance Specifications 1 through 6, as applicable.

f. CEMs for opacity and TRS compounds are required for this source.

g. The monthly average TSP shall not exceed 384 lb/day. Monthly average emissions shall be monitored by continuous opacity monitoring. The opacity monitors will provide a 24-hour average opacity that will be converted to gr/dscf and then converted to lb/day and lb/month, using the correlation between opacity and particulate emissions. M2Green shall maintain a correlation between opacity and particulate emissions (from stack test results) and use this correlation to calculate daily and monthly averages.

h. M2Green shall submit for approval, to the Department, any proposed changes to the correlation between opacity and particulate emissions equation.

i. M2Green shall not discharge into the outdoor atmosphere emissions that exhibit 20% opacity or greater averaged over 6 consecutive minutes for more than 3% of the 6-minute time periods during which M2Green is operating within a calendar quarter (ARM 17.8.321).

j. Compliance with Section II.F.2.i above shall be monitored with COMS as the primary measure of compliance with the opacity limit, except that 40 CFR 60, Appendix A, Method 9, may be used as a measure of compliance when there is reason to believe COMS data is not accurate or when COMS data is unavailable (ARM 17.8.321(15)).

3. #4 Smelt Dissolving Tank

a. TSP emissions from this source shall not exceed 0.20 lb/ton of black liquor solids processed (ARM 17.8.342 and 40 CFR 63, Subpart MM) and, in no case, shall exceed 607 lb/day and 25.29 lb/hr.

b. PM_{10} emissions from this source shall not exceed 607 lb/day and 25.29 lb/hr.

c. Compliance with the above Section II.F.3.a-b standards shall be demonstrated with EPA source sampling methods specified in 40 CFR 60, Appendix A, including back-half particulate, and by monitoring as described in 40 CFR 63.864 or as approved by the Administrator, as applicable. PM_{10} sampling methods are specified by 40 CFR 51, Appendix M, including back-half particulate. TSP results may be used as a surrogate for PM_{10} if the impinger analysis ("back-half") is included.

4. #5 Smelt Dissolving Tank (subject to 40 CFR 60, Subpart BB)

   a. TSP emissions from this source shall be limited to 0.20 lb/ton black liquor solids processed (ARM 17.8.342 and 40 CFR 63, Subpart MM), but in no case shall it exceed 120 lb/day and 5.0 lb/hr (ARM 17.8.340 and 40 CFR Part 60, Subpart BB).

   b. PM_{10} emissions from this source shall not exceed 120 lb/day and 5.00 lb/hr.

   c. Compliance with the above Section II.F.4.a-b standards shall be monitored by EPA source sampling methods specified in 40 CFR 60, Appendix A and Subpart BB, including back-half particulate, and by monitoring as described in 40 CFR 63.864 or as approved by the Administrator, as applicable. PM_{10} sampling methods are specified by 40 CFR 51, Appendix M, including back-half particulate. TSP results may be used as a surrogate for PM_{10} if the impinger analysis ("back-half") is included.

   d. M2Green shall not discharge into the outdoor atmosphere emissions that exhibit 20% opacity or greater averaged over 6 consecutive minutes (ARM 17.8.304).

5. #1 Lime Kiln

   a. TSP emissions from this source shall not exceed 0.064 gr/dscf corrected to 10% O_2 concentration (ARM 17.8.342 and 40 CFR 63, Subpart MM) and, in no case, shall exceed 288 lb/day and 12.0 lb/hr.

   b. PM_{10} emissions from this source shall not exceed 288 lb/day and 12.0 lb/hr.

   c. Total sulfate emissions from this source shall not exceed 259 lb/day and 10.79 lb/hr.

   d. TRS emissions shall not exceed 20 ppm, 24-hour average.

   e. Compliance with the above Section II.F.5.a-d standards shall be demonstrated with EPA source sampling methods specified in 40 CFR 60, Appendix A, including back-half particulate, and by monitoring as described in 40 CFR 63.864, as applicable. PM_{10} sampling methods are specified by 40 CFR 51, Appendix M, including back-half particulate. TSP results may be used as a surrogate for PM_{10} if the impinger analysis ("back-half") is included.

   f. A CEM for TRS compounds is required for this source.

6. #2 Lime Kiln

   a. TSP emissions from this source shall not exceed 0.064 gr/dscf corrected to 10% O_2 concentration (ARM 17.8.342 and 40 CFR 63, Subpart MM) and, in no case, shall exceed 266 lb/day and 11.08 lb/hr.

b. PM_{10} emissions from this source shall not exceed 266 lb/day and 11.08 lb/hr.

c. Total sulfate emissions from this source shall not exceed 239 lb/day and 9.96 lb/hr.

d. TRS emissions shall not exceed 20 ppm, 24-hour average.

e. Compliance with the above Section II.F.6.a-d standards shall be demonstrated with EPA source sampling methods specified in 40 CFR 60, Appendix A, including back-half particulate, and by monitoring as described in 40 CFR 63.864, as applicable. PM_{10} sampling methods are specified by 40 CFR 51, Appendix M, including back-half particulate. TSP results may be used as a surrogate for PM_{10} if the impinger analysis ("back-half") is included.

f. A CEM for TRS compounds is required for this source.

7. #3 Lime Kiln

a. TSP emissions from this source shall not exceed 0.064 gr/dscf corrected to 10% O_2 concentration (ARM 17.8.342 and 40 CFR 63, Subpart MM) and, in no case, shall exceed 359 lb/day and 14.96 lb/hr.

b. PM_{10} emissions from this source shall not exceed 359 lb/day and 14.96 lb/hr.

c. Total sulfate emissions from this source shall not exceed 323 lb/day and 13.46 lb/hr.

d. TRS emissions shall not exceed 20 ppm, 24-hour average.

e. Compliance with the above Section II.F.7.a-d standards shall be monitored by EPA source sampling methods specified in 40 CFR 60, Appendix A, including back-half particulate, and by monitoring as described in 40 CFR 63.864, as applicable. PM_{10} sampling methods are specified by 40 CFR 51, Appendix M, including back-half particulate. TSP results may be used as a surrogate for PM_{10} if the impinger analysis ("back-half") is included.

f. A CEM for TRS compounds is required for this source.

8. #4 Lime Kiln (subject to 40 CFR 60, Subpart BB)

a. TSP emissions from this source shall be limited to 0.064 gr/dscf corrected to 10% O_2 concentration (ARM 17.8.342 and 40 CFR 63, Subpart MM), and, in no case, shall exceed 204.0 lb/day and 8.50 lb/hr. This limitation is consistent with a maximum flow rate of 14,800 dscfm. (ARM 17.8.340 and 40 CFR Part 60, Subpart BB).

b. PM_{10} emissions from this source shall not exceed 204.0 lb/day and 8.50 lb/hr.

c. Total sulfate emissions from this source shall not exceed 204.0 lb/day and 8.50 lb/hr.

d. TRS emissions shall not exceed 8.0 ppm, 12-hour average.

e. Compliance with the above Section II.F.8.a-c standards shall be monitored by EPA source sampling methods specified in 40 CFR 60, Appendix A and Subpart BB, and by monitoring as described in 40 CFR 63.864, as applicable. PM_{10} sampling methods are specified by 40 CFR 51, Appendix M. TSP results may be used as a surrogate for PM_{10} if the impinger analysis ("back-half") is included. Compliance with the TRS standard described in Section II.F.8.d shall be demonstrated with continuous monitoring, with 12-hour averages.

f. A CEM for TRS compounds is required for this source.

g. Opacity is limited to 20% (ARM 17.8.304).

9. #1 Lime Slaker

a. TSP emissions from this source shall not exceed 110 lb/day and 4.58 lb/hr.

b. PM_{10} emissions from this source shall not exceed 110 lb/day and 4.58 lb/hr.

c. Compliance with the above standards shall be monitored by EPA source sampling methods specified in 40 CFR 60, Appendix A, including back-half particulate. PM_{10} sampling methods are specified by 40 CFR 51, Appendix M. TSP results may be used as a surrogate for PM_{10} if the impinger analysis ("back-half") is included.

10. #2 Lime Slaker

a. Opacity is limited to 20% (ARM 17.8.304).

b. TSP emissions from this source shall not exceed 146 lb/day and 6.08 lb/hr (ARM 17.8.752).

c. PM_{10} emissions from this source shall not exceed 146 lb/day and 6.08 lb/hr (ARM 17.8.752).

d. If the Department requires testing per ARM 17.8.105, compliance with the above standards shall be monitored by EPA source sampling methods specified in 40 CFR 60, Appendix A, including back-half particulate. PM_{10} sampling methods are specified by 40 CFR 51, Appendix M, including back-half particulate. TSP results may be used as a surrogate for PM_{10} if the impinger analysis ("back-half") is included.

11. #3 Lime Slaker

a. TSP emissions from this source shall not exceed 72 lb/day and 3.00 lb/hr.

b. PM_{10} emissions from this source shall not exceed 72 lb/day and 3.00 lb/hr.

c. If the Department requires testing per ARM 17.8.105, compliance with the above standards shall be monitored by EPA source sampling methods specified in 40 CFR 60, Appendix A, including back-half particulate. PM_{10} sampling methods are specified by 40 CFR 51, Appendix M, including back-half particulate. TSP results may be used as a surrogate for PM_{10} if the impinger analysis ("back-half") is included.

12. Multi-fuel Boiler (subject to 40 CFR 60, Subpart D)

a. Consumption of dewatered sludge from the sludge dewatering plant by the multi-fuel boiler shall not exceed a total of 21,900 tons/year (ARM 17.8.752).

b. Sulfur content of the dewatered sludge used as fuel for the multi-fuel boiler shall not exceed 0.4% (ARM 17.8.752).

c. Any dewatered sludge used as fuel for the multi-fuel boiler shall originate from the primary clarifier (ARM 17.8.749).

d. The dewatered sludge shall be thoroughly blended with the existing hog fuel (ARM 17.8.749).

e. The pH of the scrubber water on the multi-fuel boiler shall be maintained at greater than 7 (ARM 17.8.749).

f. Emissions of SO_2 from the combustion of primary clarifier sludge in the multi-fuel boiler shall be limited to 5.70 lb/hr (ARM 17.8.752).

g. M2Green shall conduct an analysis of the dewatered sludge to determine compliance with the above sulfur limitation at least annually. The results of these analyses shall be retained by M2Green for a minimum of 5 years and shall be submitted to the Department upon request.

h. TSP emissions from this boiler shall not exceed 0.10 lb/MMBtu fired and 52.04 lb/hr and 1249 lb/day (ARM 17.8.340 and 40 CFR 60, Subpart D).

i. PM_{10} emissions from this boiler shall not exceed 1249 lb/day and 52.04 lb/hr and 0.1 lb/million Btu fired.

j. SO_2 emissions from this source shall not exceed 0.80 lb/million Btu and 429.6 lb/hr when firing liquid fossil fuel or liquid fossil fuel and wood residue (ARM 17.8.340 and 40 CFR 60, Subpart D).

k. Nitrogen dioxide (NO_2) emissions from this boiler shall not exceed 0.30 lb/MMBtu and 161.1 lb/hr when firing liquid fossil fuel, liquid fossil fuel and wood residue, or gaseous fossil fuel and wood residue. NO_2 emissions from the Multi-fuel Boiler shall not exceed 0.20 lb/MMBtu when firing natural gas for more than 24 consecutive hours (ARM 17.8.340 and 40 CFR 60, Subpart D).

l. Compliance with the above standards shall be monitored by EPA source sampling methods specified in 40 CFR 60, Appendix A and Subpart D. PM_{10} sampling methods are specified by 40 CFR 51, Appendix M, including back-half particulate. TSP results may be used as a surrogate for PM_{10} if the impinger analysis ("back-half") is included.

m. CEMs for SO_2, NO_2, and either O_2 or carbon dioxide (CO_2) are required for this source.

n. Opacity is limited to 20% (ARM 17.8.340 and 40 CFR 60, Subpart D).

13. Sawdust, Chips, and Hog Fuel Unloading, Storage, and Handling

a. Sawdust - This activity is limited to 0.75 lb/ton of sawdust handled for total particulate and 0.27 lb/ton of sawdust handled for PM_{10} (SCC #3-07-008-03) with hood and skirt controls at 25%.

i. The total sawdust pile emissions shall be calculated as: TSP = {(Qty Sawdust overs)*(0.18*[1-.25])/2000 + (Qty Sawdust receipts-Qty Sawdust overs)*(1.0*[1-.25])/2000} = Total tons TSP emissions.

The total sawdust pile emissions shall be calculated as: PM_{10} = {(Qty Sawdust overs)*(0.065*[1-.25])/2000 + (Qty Sawdust receipts-Qty Sawdust overs)*(0.36*[1-.25])/2000} = Total tons PM_{10} emissions.

ii. M2Green shall ensure that the 10-ft maximum distance is met at all times. When the material under the belt is reclaimed, M2Green shall shut down the conveyor, remove the material, and fill in the void with new material before restarting the conveyor to ensure the 10-ft maximum is met.

b. Chips - This activity is limited to 0.18 lb/ton of chips handled for TSP and 0.065 lb/ton of chips handled for PM_{10} (State emission estimate).

c. Hog Fuel - This activity is limited to 1.0 lb/ton of hog fuel handled for TSP and 0.36 lb/ton of hog fuel handled for PM_{10} (SCC #3-07-008-03).

d. Fines sent to hog fuel from chip screen - This activity is limited to 0.27 lb/ton (controlled) of fines handled for TSP and 0.09 lb/ton (controlled) of fines handled for PM_{10} (M2Green emission estimate).

e. Fines sent to hog fuel from sawdust screen - This activity is limited to 0.75 lb/ton (controlled) of fines handled for TSP and 0.27 lb/ton (controlled) of fines handled for PM_{10} (M2Green emission estimate).

f. Screened chips to Kamyr pile - This activity is limited to 0.045 lb/ton of chips handled for TSP and 0.001 lb/ton of pins handled for PM_{10} (M2Green emission estimate).

g. Screened chips to batch pile - This activity is limited to 0.045 lb/ton of chips handled for TSP and 0.001 lb/ton of chips handled for PM_{10} (M2Green emission estimate).

h. Screened sawdust overs to chip pile - This activity is limited to 0.09 lb/ton of screened sawdust overs to chip pile handled for TSP and 0.005 lb/ton of screened sawdust overs to chip pile handled for PM_{10} (M2Green emission estimate).

i. Visible emissions from the proposed storage bin and the proposed storage bin unloading system shall be limited to 20% opacity (ARM 17.8.308 and ARM 17.8.304).

14. Brown Stock Washers

a. Emissions from the Brown Stock Washers shall be collected with a closed vent system and routed to the Direct Fired Thermal Oxidizer.

15. Batch and Continuous Digesters

a. All gaseous emissions from these units shall be ducted to the thermal oxidizer for oxidation of reduced sulfur compounds.

b. All gaseous emissions from the steam stripper shall be ducted to the thermal oxidizer for oxidation of reduced sulfur compounds.

16. M & D Cyclone

a. TSP emissions from this cyclone shall be limited to 60 lb/day and 2.5 lb/hr.

b. PM_{10} emissions from this cyclone shall be limited to 24 lb/day and 1.0 lb/hr.

c. If the Department requires testing per ARM 17.8.105, compliance with the above standards shall be monitored by EPA source sampling methods specified in 40 CFR 60, Appendix A. PM_{10} sampling methods are specified by 40 CFR 51, Appendix M, including back-half particulate. TSP results may be used as a surrogate for PM_{10} if the impinger analysis ("back-half") is included.

d. This cyclone shall not be operated more than 8,544 hours during any 12-month rolling period.

17. Micro-Pulsaire Baghouse (controls nuisance dust for the FORMM system)

a. TSP emissions from this baghouse shall be limited to 22.8 lb/day and 0.95 lb/hr.

b. PM_{10} emissions from this baghouse shall be limited to 22.8 lb/day and 0.95 lb/hr.

c. This baghouse shall be tested to monitor compliance with the limitations included in items in Sections II.F.17.a-b annually.

d. Compliance with the above standards shall be monitored by EPA source sampling methods specified in 40 CFR 60, Appendix A. PM_{10} sampling methods are specified by 40 CFR 51, Appendix M, including back-half particulate. TSP results may be used as a surrogate for PM_{10} if the impinger analysis ("back-half") is included.

18. ADS Slicers and Cyclones

a. TSP emissions from these sources shall not exceed 26.4 lb/day and 1.10 lb/hr for each cyclone.

b. PM_{10} emissions from this source shall not exceed 26.4 lb/day and 1.1 lb/hr for each cyclone.

c. If the Department requires testing per ARM 17.8.105, compliance with the above standards shall be monitored by EPA source sampling methods specified in 40 CFR 60, Appendix A. PM_{10} sampling methods are specified by 40 CFR 51, Appendix M, including back-half particulate. TSP results may be used as a surrogate for PM_{10} if the impinger analysis ("back-half") is included.

d. These cyclones shall not be operated more than 8,544 hours during any 12-month rolling period per cyclone.

19. Sawdust Overs Cyclone

a. TSP emissions from these sources shall not exceed 26.4 lb/day and 1.1 lb/hr for each cyclone.

b. PM_{10} emissions from this source shall not exceed 26.4 lb/day and 1.1 lb/hr for each cyclone.

c. If the Department requires testing per ARM 17.8.105, compliance with the above standards shall be monitored by EPA source sampling methods specified in 40 CFR 60, Appendix A. PM_{10} sampling methods are specified by 40 CFR 51, Appendix M, including back-half particulate. TSP results may be used as a surrogate for PM_{10} if the impinger analysis ("back-half") is included.

d. This cyclone shall not be operated more than 8,544 hours during any 12-month rolling period.

20. #3 Paper Machine

The yearly production from the #3 Paper Machine shall be limited to 481,000 tons of air dried tons of finished product (ADTFP) during any rolling 12-month period. This limit includes pulp input from the pulp mill, as well as other sources (i.e., the OCC plant).

21. Soda Ash System

TSP and PM_{10} emissions from the soda ash storage silo and associated pneumatic truck unloading station shall be controlled with a bin vent dust collector and shall not exceed 0.02 gr/dscf (ARM 17.8.752).

22. Scrubber Operational Checks

The following scrubber operational checks shall be performed on a weekly basis.

a. Multi-fuel Boiler

i. Scrubber shower water flows
ii. Scrubber pressure differential
iii. Scrubber water pH check

b. M2Green shall maintain a record of such checks, which the Department may inspect at any time.

23. Plant-Wide SO_2 Limitation

Total SO_2 emissions from the mill shall not exceed 5,000 lb/day. In the event of a total natural gas curtailment, M2Green shall report, in addition to the normal report, the following:

a. Daily SO_2 emissions from recovery boilers and power boilers.

b. Dates and times of curtailment.

c. Quantity and sulfur content of fuel oil burned.

d. All fuel oil burned must comply with ARM 17.8.322 – Sulfur In Fuel Oil rule, unless sulfur dioxide emissions are controlled on an equivalent basis.

24. NSPS Testing Requirements -- Those sources subject to Federal New Source Performance Standards shall comply with the testing, monitoring, and reporting requirements as applicable (ARM 17.8.340 and 40 CFR Part 60).

25. M2Green shall not cause or authorize emissions to be discharged into the atmosphere that exhibit an opacity of 40% or greater, based on a 6-minute average, from any source, stack or fugitive installed on or before November 23, 1968 (ARM 17.8.304 and ARM 17.8.308).

26. M2Green shall not cause or authorize to be discharged into the atmosphere visible emissions that exhibit an opacity of 20% or greater, based on a 6-minute average, from any source, stack or fugitive installed or altered after November 23, 1968, unless otherwise specified (ARM 17.8.304 and ARM 17.8.308).

27. M2Green shall not cause or authorize to be discharged into the atmosphere from the thermal oxidizer:

a. Any visible emissions that exhibit an opacity of 20% or greater (ARM 17.8.752); and

b. Any particulate matter emissions in excess of 0.10 gr/dscf corrected to 10% O_2 (ARM 17.8.752).

28. M2Green shall comply with all applicable standards and limitations, and the reporting, recordkeeping, and notification requirements contained in 40 CFR 63, Subpart S (ARM 17.8.342 and 40 CFR 63, Subpart S).

29. Plant-wide Wood Pulp Limitation (ARM 17.8.749)

Total wood pulp production shall not exceed 535,000 oven-dry tons (ODT) per rolling 12-month period. Wood pulp production shall be calculated based on a mill day (24 hour period starting at 5:00 am) using the following methodology (equations a-c):

a. Fiber usage on machines (tons, as produced) = Paper machine production (tons, as produced) +/- change in Cull production inventory (tons, as produced)

b. Fiber usage on machines (oven-dry tons) = Fiber usage on machines (tons, as produced) x (1.0 – moisture content of paper – chemical additive content of the linerboard)

c. Wood pulp production (ODT) = Fiber usage on machines (ODT) – OCC usage on machines (ODT) +/- Wood pulp high density storage change (ODT).

30. M2Green shall comply with all applicable standards and limitations, and the reporting, recordkeeping, and notification requirements contained in 40 CFR 63, Subpart MM (ARM 17.8.342 and 40 CFR 63, Subpart MM).

31. The Department may require further testing (ARM 17.8.105).

SECTION III: Continuous Emission Monitoring Systems

A. #4 Recovery Boiler

1. An opacity CEM is to be operated and maintained on the #4 Recovery Boiler. This CEM is required to conform to federal specifications. The opacity CEM is required to provide a daily (mill day: the 24-hour period from 5:00 am to 5:00 am) average opacity reading.

2. A TRS CEM is required by state permit for the boiler. This CEM is not required to conform to federal specifications.

B. #5 Recovery Boiler (subject to 40 CFR 60, Subpart BB)

1. An opacity CEM is required by state permit and federal regulations. This CEM shall conform to Performance Specification 1 found in 40 CFR 60, Appendix B.

2. This opacity CEM shall have a span set at 70% opacity as required by 40 CFR 60, Appendix B and Subpart BB.

3. A TRS CEM is required by state permit and federal regulation. This CEM shall conform to federal specifications as required by 40 CFR 60, Appendix B, Specification 5.

C. #1, #2, and #3 Lime Kilns

A TRS CEM is required by state permit for each kiln. This CEM is not required to conform to federal specifications.

D. #4 Lime Kiln (subject to 40 CFR 60, Subpart BB)

A TRS CEM is required by state permit and federal regulations. This CEM shall conform to federal specifications as required by 40 CFR 60, Appendix B, Specification 5.

E. Multi-fuel Boiler (subject to 40 CFR 60, Subpart D)

1. An SO_2 CEM is required by federal regulation and state permit when this boiler is fired on oil. This CEM shall conform to federal specifications as required by Specification 2 of 40 CFR 60, Appendix B.

2. A NO_x CEM is required by federal regulation and state permit. This CEM shall conform to federal specifications as required by Specification 2 of 40 CFR 60, Appendix B.

3. Either an O_2 or CO_2 CEM is required as provided in 40 CFR 60.45.

SECTION IV: Reporting Requirements

A. Operational and Emission Inventory Reporting Requirements

1. M2Green shall supply the Department with annual production information for all emission points, as required by the Department in the annual emission inventory request. The request will include, but is not limited to, all sources of emissions identified in the emission inventory contained in the permit analysis and sources identified in Section I of this permit.

Production information shall be gathered on a calendar-year basis and submitted to the Department by the date required in the emission inventory request. Information shall be in the units required by the Department and shall include, but is not limited to, the following (ARM 17.8.505):

SOURCE	UNITS OF MATERIAL PROCESSED
a. Multi-fuel Boiler	Hog Fuel (including MDF pellets) - ton/yr Nat Gas - million cubic feet (MCF)/yr Fuel Oil (including recycled oil) - Mgal/yr Dewatered Sludge - ton/yr
b. Power Boiler	Nat Gas - MCF/yr
c. #4 Recovery Boiler	Black Liquor - ton/yr Nat Gas - MCF/yr Fuel Oil (including recycled oil) - Mgal/yr

d. #5 Recovery Boiler	Black Liquor - ton/yr Nat Gas - MCF/yr Fuel Oil (including recycled oil) - Mgal/yr
e. #1 Lime Kiln	Nat Gas - MCF/yr Fuel Oil (including recycled oil) - Mgal/yr Lime Mud - ton/yr Petrol Coke - ton/yr
f. #2 Lime Kiln	Nat Gas - MCF/yr Fuel Oil (including recycled oil) - Mgal/yr Lime Mud - ton/yr Petrol Coke - ton/yr
g. #3 Lime Kiln	Nat Gas - MCF/yr Fuel Oil (including recycled oil) - Mgal/yr Lime Mud - ton/yr Petrol Coke - ton/yr
h. #4 Lime Kiln	Nat Gas - MCF/yr Fuel Oil (including recycled oil) - Mgal/yr Lime Mud - ton/yr Petrol Coke - ton/yr
i. #4 Dissolver	Black Liquor - ton/yr
j. #5 Dissolver	Black Liquor - ton/yr
k. #1 Slaker	Lime - ton/yr
l. #2 Slaker	Lime - ton/yr
m. #3 Slaker	Lime - ton/yr
n. Pulp Produced	Pulp - ADT/yr
o. Linerboard Produced	Linerboard - ADT/yr
p. OCC Waste Burned	OCC Waste - ton/yr
q. #1 Slicer	Chips Sliced - ton/yr
r. #2 Slicer	Chips Sliced - ton/yr
s. #3 Slicer	Chips Sliced - ton/yr
t. #4 Slicer	Chips Sliced - ton/yr
u. Sawdust Screen	Sawdust Screened - ton/yr
v. #3 Paper Machine	Air-dried paper (including OCC plant input) - ton/yr

w. Hours of operation for the mill and each source if different from the mill operation time.

x. Fugitive dust information:

i. Tons of chips received for the year

ii. Tons of sawdust received for the year

iii. Tons of hog fuel received for the year

iv. Tons of fines sent to hog fuel from chip screen

v. Tons of fines sent to hog fuel from sawdust screen

vi. Tons of fines sent to storage bin from chip screen

vii. Tons of fines sent to storage bin from sawdust screen

viii. Tons of screened chips to Kamyr pile

ix. Tons of screened chips to batch pile

x. Tons of ADS rejected to hog fuel pile

xi. Tons of screened sawdust overs to chip pile (as determined by weightometer on the sawdust overs belt).

2. M2Green shall notify the Department of any construction or improvement project conducted pursuant to ARM 17.8.745, that would include a change of control equipment, stack height, stack diameter, stack flow, stack gas temperature, source location, or fuel specifications, or would result in an increase in source capacity above its permitted operation or the addition of a new emission unit. The notice must be submitted to the Department, in writing, 10 days prior to start up or use of the proposed de minimis change, or as soon as reasonably practicable in the event of an unanticipated circumstance causing the de minimis change, and must include the information requested in ARM 17.8.745(1)(d) (ARM 17.8.745).

3. All records compiled in accordance with this permit must be maintained by M2Green as a permanent business record for at least 5 years following the date of the measurement, must be available at the plant site for inspection by the Department, and must be submitted to the Department upon request (ARM 17.8.749).

B. Monthly Reporting Requirements

1. General Requirements

Stack tests performed by employees of the Missoula Mill shall be submitted with the monthly reports.

2. Lime Kilns

M2Green shall report the daily average TRS for the No.1, No.2, and No. 3 Lime Kilns. M2Green shall include, for the No. 4 Lime Kiln, a report of 12-hour averages.

3. Recovery Boilers

a. M2Green shall report the daily average TRS for all recovery boilers. M2Green shall include, for recovery boilers subject to 40 CFR 60, Subpart BB, a report on a 12-hour basis.

b. M2Green shall report a monthly average for pounds of sulfur emitted per 1000 pounds of black liquor burned for all recovery boilers.

c. M2Green shall, for recovery boilers subject to 40 CFR 60, Subpart BB, report opacity on a 24-hour average basis.

d. M2Green shall report for all recovery boilers average daily and average monthly total particulate emissions as determined by the correlation equations used to determine the particulate mass emissions. This report shall include daily calculated grain loading (gr/dscf), air flow (dscfm), total particulate (lb/hour), and the 24-hour average opacity. For the #5 Recovery Boiler, M2Green shall report percent O_2 and grain loading (gr/dscf) corrected for O_2.

e. M2Green shall report all exceedances of the opacity standard for recovery boilers subject to 40 CFR 60, Subpart BB.

4. Multi-fuel Boiler

M2Green shall report, for all boilers subject to 40 CFR 60, Subpart D, the 3-hour averages for SO_2 and NO_x as specified by federal regulations.

5. Pulp Mill Production

Average daily pulp production shall be reported in air-dried tons of pulp per day and average daily black liquor burning rates for each recovery boiler in pounds per day.

6. Plant-wide Wood Pulp Production

M2Green shall document, by month, plant-wide wood pulp production. By the 25th day of each month, M2Green shall calculate the amount of plant-wide wood pulp production for the previous month. The monthly information will be used to verify compliance with the limitation in Section II.G.31.

C. Quarterly Excess Emission Reports

M2Green shall submit quarterly excess emission reports for all CEMs required by NSPS as specified in 40 CFR 60.7(c). This report shall include:

1. The magnitude of excess emissions computed in accordance with 60.13(h), any conversion factors used, and the date and time of commencement and completion of each time period of excess emissions.

2. Specific identification of each period of excess emissions that occurs during startups, shutdowns, and malfunctions of the affected facility; the nature and cause of any malfunction (if known); and the corrective action taken or preventative measures adopted.

3. The date and time identifying each period during which the continuous monitoring system was inoperative, except for zero and span checks, and the nature of the system repairs or adjustments.

4. When no excess emissions have occurred, or the continuous monitoring systems have been inoperative, such information shall be stated in the report.

5. The excess emission reports shall be completed in a format supplied or approved by the Department.

D. Failure to report CEM data required by this section, which is not available because of monitor downtime or insufficient quality assurance, shall not be considered a violation of the reporting requirements of this section. However, the unavailability of such data may be a violation of the monitoring requirements of Section III - Continuous Emission Monitoring Systems (ARM 17.8.749).

E. M2Green shall comply with the recordkeeping and reporting in accordance with 40 CFR 63, Subpart S and 40 CFR 63.10 (ARM 17.8.342 and 40 CFR 63, Subparts A and S).

F. M2Green shall comply with the recordkeeping and reporting in accordance with 40 CFR 63, Subpart MM and 40 CFR 63.10 (ARM 17.8.342 and 40 CFR 63, Subparts A and MM).

SECTION V: Compliance

M2Green shall comply with all conditions contained in Attachment C, except for those conditions superseded by more stringent conditions contained in the main section of this permit.

SECTION VI: State-only Provisions (State-only enforceable): Ambient Air Monitoring Program

M2Green shall conduct an ambient air monitoring program in accordance with Attachment 1 (ARM 17.8.204).

SECTION VII: General Conditions

A. Inspection - M2Green shall allow the Department's representatives access to the source at all reasonable times for the purpose of making inspections or surveys, collecting samples, obtaining data, auditing any monitoring equipment (CEMS, CERMS) or observing any monitoring or testing, and otherwise conducting all necessary functions related to this permit.

B. Waiver - The permit and all the terms, conditions, and matters stated herein shall be deemed accepted if M2Green fails to appeal as indicated below.

C. Compliance with Statutes and Regulations - Nothing in this permit shall be construed as relieving M2Green of the responsibility for complying with any applicable federal or Montana statute, rule or standard, except as specifically provided in ARM 17.8.740, *et seq.* (ARM 17.8.756).

D. Enforcement - Violations of limitations, conditions and requirements contained herein may constitute grounds for permit revocation, penalties or other enforcement as specified in Section 75-2-401 *et seq.*, MCA.

E. Appeals – Any person or persons jointly or severally adversely affected by the Department's decision may request, within 15 days after the Department renders its decision, upon affidavit setting forth the grounds therefore, a hearing before the Board of Environmental Review (Board). A hearing shall be held under the provisions of the Montana Administrative Procedures Act. The filing of a request for a hearing does not stay the Department's decision, unless the Board issues a stay upon receipt of a petition and a finding that a stay is appropriate under Section 75-2-211(11)(b), MCA. The issuance of a stay on a permit by the Board postpones the effective date of the Department's decision until conclusion of the hearing and issuance of a final decision by the Board. If a stay is not issued by the Board, the Department's decision on the application is final 16 days after the Department's decision is made.

F. Permit Inspection - As required by ARM 17.8.755, Inspection of Permit, a copy of the air quality permit shall be made available for inspection by Department personnel at the location of the permitted source.

G. Permit Fee - Pursuant to Section 75-2-220, MCA, as amended by the 1991 Legislature, failure to pay the annual operation fee by M2Green may be grounds for revocation of this permit, as required by that section and rules adopted thereunder by the Board.

H. Duration of Permit – Construction or installation must begin or contractual obligations entered into that would constitute substantial loss within 3 years of permit issuance and proceed with due diligence until the project is complete or the permit shall expire (ARM 17.8.762).

ATTACHMENT C

Modified June 14, 1989
Conditions of MAQP #2589

MAQP #2589 (originally #792-013075) is hereby altered to include the OCC facility to be installed during the summer of 1989. This alteration is conducted in accordance with ARM 17.8.748. Since there is no significant increase in emissions, only ARM 17.8.740, Montana Permit Rule, will apply. This rule requires Best Available Control Technology (BACT) to be applied to the air pollution control equipment.

Section I: Permitted Facilities

A. The general facilities associated with this project are:

1. Unloading docks for 400 tons per day (TPD) of old cardboard
2. Shredder and repulping tank
3. Cleaning facilities to remove burnable and nonburnable waste from the old cardboard
4. Disposal systems for all waste removed from the old cardboard

B. Emission Inventory for the Multi-fuel Boiler

Current average fuel consumption is:

Waste wood - 7955 ton/month x 12 = 95,460 ton/yr
Natural gas - 3648 MCF/month x 12 = 43,776 MCF/yr

1. Current Emissions (from wood combustion):

	Emissions
Particulate from company stack test	18.0 TPY
SO_2 - .15 lb/ton x .5 scrub eff x 95460 ton wood/yr x 1/2000	3.5 TPY
NO_x - 2.8 lb/ton x 1 scrub eff x 95460 ton wood/yr x 1/2000	133.6 TPY
CO - 4.0 lb/ton x 1 scrub eff x 95460 ton wood/yr x 1/2000	190.9 TPY
Volatile Organic Compounds –Non-Methane ($VOC_{(NM)}$) - 1.4 lb/ton x 1 scrub eff x 95460 ton wood/yr x 1/2000 (from AP-42 1.6-1)	66.8 TPY

Natural gas emissions are negligible. The highest contribution from natural gas would be approximately 1 TPY of NO_x; all other pollutants are less than 1 TPY.

2. Emissions from Waste Plastic Combustion:

Waste combustion rate: 15.1 ton/day, 468 ton/month, 5616 TPY
AP-42 2.1-3 Uncont. E.F. for Commercial and Ind. Refuse
Particulate = 7 lb/ton x .04 scrub eff x 5616 x 1/2000 =0.8 TPY
(Multichamber)

SO_2	2.5	x .5	x 5616 x 1/2000 = 3.5 TPY
NO_x	3	x 1	x 5616 x 1/2000 = 8.4 TPY
VOC	3	x 1	x 5616 x 1/2000 = 8.4 TPY
CO	10	x 1	x 5616 x 1/2000 = 28.0 TPY

3. Toxics Review

These emissions are calculated from laboratory results of two samples of plastic waste, which were collected from two paper recycling plants currently in operation. Analysis was done by Badger Laboratories for M2Green Container (letter from Ms. Jenny Brown to W. Norton, dated 2-14-89)

Chloride analysis (as total halide)

Max. value - 0.43% x 15.1 ton/day x 365 day/yr x 0.04 scrub eff x 2000 lb/ton = 1896 lb/yr

(This assumes all chloride goes to scrubber; some may remain in bottom ash.)

Beryllium

Max. value - .05 ppm x 15.1 ton/day x 2000 lb/ton x 365 day/yr = 0.55 lb/yr

Cadmium

Max. value - <.05 ppm x 15.1 ton/day x 2000 lb/ton x 365 day/yr = <0.5 lb/yr

Lead

Max. value - 12.6 ppm x (11.02) = 138.9 lb/yr

Mercury

Max. value - <0.01 x 11.02 = <0.1 lb/yr

4. Emission Summary

Parameter	Existing	Plastic Emissions	Total Proposed
Particulate	18 TPY	1 TPY	19 TPY
SO_2	4	3	7
NO_x	134	8	142
CO	191	28	219
$VOC_{(NM)}$	67	8	75

Parameter	Existing	Plastic Emissions	Total Proposed
Toxics:			
Cl	--	1896 lb/yr	1896 lb/yr
Be	--	0.5	0.5
Cd	--	<0.5	<0.5
Pb	--	138.9	138.9
Hg	--	<0.1	<0.1

C. Applicable Regulations

1. NSPS - Not applicable - OCC plants are not a listed component of Kraft pulp mills (see 40 CFR 60, Subpart BB – specifically 40 CFR 60.280a).

2. Prevention of Significant Deterioration - Not applicable - emissions are not significant (See ARM 17.8.801).

3. State Permit Rule - ARM 17.8.764 is applicable and requires that BACT be applied to the permit alteration.

4. BACT Analysis

The applicant proposed the disposal of 15.1 tons per day of waste plastic in the hog fuel boilers. These boilers are currently controlled with wet scrubbers. The waste fuel boiler is subject to the NSPS limits and the Air Resources Management Bureau has accepted this scrubber as BACT for this case. The scrubber water maintains a pH between 7.0 and 9.0, which should provide good collection efficiencies for chloride gases. Therefore, the Department accepts this control as BACT for this case.

5. Other Toxic Emissions

Lead - Less than 0.6 TPY - exempt from permitting. Company analysis shows 138.9-lb/yr emission or 0.07 TPY. This is less than 12% of the lead emissions that require permitting under ARM 17.8.745.

Beryllium - Less than 0.0004 TPY-is not significant for PSD purposes. Company analysis shows 0.55 lb/yr or 0.0003 TPY.

Mercury - Less than 0.1 TPY-is not significant for PSD purposes. Company analysis shows 0.11 lb/yr or 0.00 TPY.

Therefore, a permit alteration will be required at this time for disposal of this plastic waste in the hog fuel boilers. However, a stack test for chloride emissions will be required after the system is operational to prove that actual emissions do not exceed the worst case analysis referred to above.

Section II: Limitations and Conditions

A. The boiler used for disposal of the burnable waste shall be tested for particulate and for chloride emissions to prove compliance with existing regulations. The chloride emissions shall be compared with the estimated emissions from the permit application. These tests shall conform to EPA stack testing methods 1-5, and the Montana Source Test Protocol and Procedures Manual.

B. A one-time check on the levels of heavy metals emitted from the combustion of waste plastic is required. This shall consist of an analysis of the stack gas for lead, cadmium, beryllium and mercury. These tests shall be done by methods acceptable to EPA and the Department, and be performed at the same time the particulate and chloride tests are done. These tests shall be completed within 1 year of the start-up date for the used fiber recycle plant.

Section III: Ambient Air Monitoring and Reporting Requirements

No additional ambient monitoring requirements apply at this time.

ATTACHMENT 1

State-only Provision (State-only enforceable): AMBIENT AIR MONITORING PLAN
M2Green Redevelopment, LLC
MAQP #2589-16

1. This ambient air monitoring plan is required by MAQP #2589-16, which applies to M2Green's Kraft pulp mill operation located approximately 10 miles northwest of Missoula, Montana. In the event of the complete shutdown of permitted emitting units at the M2Green mill, M2Green may discontinue ambient monitoring as of September 30th following that complete shutdown unless violations of the ambient standard are recorded at the ambient monitors in the timeframe between complete shutdown and the September 30th date. In that event, the Department will reevaluate an appropriate monitor discontinuation date based on the data collected. Similarly, in the event that the M2Green mill (or any permitted emitting units within the mill) restarts operations, the Department will reevaluate the need for ambient monitoring based on the emitting units restarting or proposed to restart. The Department may modify the requirements of this monitoring plan. All requirements of this plan are considered state-only enforceable conditions of the permit.

2. The requirements of this attachment shall take effect within 30 days of permit issuance, unless otherwise approved in writing by the Department.

3. M2Green shall operate and maintain two air monitoring sites in the vicinity of the mill and facilities. The exact locations of the monitoring sites must be approved by the Department and meet all the siting requirements contained in the Montana Quality Assurance Manual, including revisions; the EPA Quality Assurance Manual, including revisions; and40 Code of Federal Regulations (CFR) Part 58; or any other requirements specified by the Department.

4. Within 30 days prior to any changes of the location of the ambient monitors, M2Green shall submit a topographic map to the Department identifying UTM coordinates, air monitoring site locations in relation to the facility, and the general area present.

5. M2Green shall continue air monitoring for at least 2 years after installation of the monitor described in Section 2 above. The Department will review the air monitoring data and the Department will determine if continued monitoring or additional monitoring is warranted. The Department may require continued air monitoring to track long-term impacts of emissions from the facility or require additional ambient air monitoring or analyses if any changes take place in regard to quality and/or quantity of emissions or the area of impact from the emissions.

6. M2Green shall monitor the following parameters at the sites and frequencies described below:

AIRS # and Site Name	UTM Coordinates	Code & Parameter	Frequency
30-063-0034 Moccasin Lane #1A	Zone 11 N 520 3200 E 719 000	42402 H_2S[1]	Continuous
		61101 Wind Speed and Direction	Continuous
		61106 Standard Deviation of Wind Direction (sigma theta)	Continuous
30-063-0022 Site #2A	Zone 11 N 520 8155 E 712 395	42402 H_2S	Continuous

[1] H_2S = hydrogen sulfide.

7. Data recovery for all parameters shall be at least 80% computed on a quarterly and annual basis. The Department may require continued monitoring if this condition is not met. (Data Recovery = (Number of data points collected in evaluation period)/(number of scheduled data points in evaluation period)*(100%))

8. Any ambient air monitoring changes proposed by M2Green must be approved, in writing, by the Department.

9. M2Green shall utilize air monitoring and Quality Assurance (QA) procedures that are equal to or exceed the requirements described in the Montana Quality Assurance Manual, including revisions; the EPA Quality Assurance Manual, including revisions; 40 CFR Parts 50 and 58; and any other requirements specified by the Department.

10. M2Green shall submit two hard copies of quarterly data reports within 45 days after the end of the calendar quarter and two hard copies of the annual data report within 90 days after the end of the calendar year.

11. The quarterly data submittals shall consist of a hard copy narrative data summary and a digital submittal of all data points in AIRS batch code format. The electronic data must be submitted to the Air Monitoring Section as digital text files readable by an office PC with a Windows operating system.

    The narrative data hard copy summary must be submitted to the Air Compliance Section and shall include:

    a. A hard copy of the individual data points,

    b. The first and second highest hourly concentrations for H_2S at each site,

    c. The quarterly and monthly wind roses,

    d. A summary of the data completeness,

    e. A summary of the reasons for missing data,

    f. A precision data summary,

    g. A summary of any ambient air standard exceedances, and

    h. QA/QC information such as zero/span/precision, calibration, audit forms, and standards certifications.

12. The annual data report shall consist of a narrative data summary. The narrative data hard copy summary must be submitted to the Air Compliance Section and shall include:

    a. A topographic map of appropriate scale with UTM coordinates and a true north arrow showing the air monitoring site locations in relation to the mill and facilities and the general area,

    b. The year's ten highest hourly concentrations for H_2S at each site,

    c. The annual wind rose,

d. A summary of any ambient air standard exceedances, and

e. An annual summary of data completeness.

13. All records compiled in accordance with this Attachment must be maintained by M2Green as a permanent business record for at least 5 years following the date of the measurement, must be available at the plant site for inspection by the Department, and must be submitted to the Department upon request (ARM 17.8.749).

14. The Department may audit (or may require M2Green to contract with an independent firm to audit) the air monitoring network, the laboratory performing associated analysis, and any data handling procedures at unspecified times.

15. The hard copy reports should be sent to:
Department of Environmental Quality
Attention: Air Compliance Section Supervisor

16. The electronic data from the quarterly monitoring shall be sent to:
Department of Environmental Quality
Attention: Air Monitoring Section Supervisor

Montana Air Quality Permit (MAQP) Analysis
M2Green Redevelopment, LLC
MAQP #2589-16

I. Introduction/Process Description

A. Process Description

M2Green Redevelopment, LLC (M2Green) operates a kraft pulp and liner mill in Section 24, Township 14 North, Range 21 West in Missoula County. This facility produces linerboard and other paper products by converting wood chips into pulp and then into paper. M2Green uses a typical kraft recovery plant in which the cooking salts are recovered from the digestion process and reused. M2Green uses several batch digesters and two continuous digesters to separate the wood fiber from the wood matrix. Digestion gases are controlled with a condenser and all noncondensible gases are incinerated in the lime kilns. The black liquor recovered from this process is used as a fuel in the recovery furnaces and the cooking salts are recovered to be used again. The recaust portion of the plant uses several lime kilns to convert calcium carbonate to calcium oxide, which is then used in converting green liquor from the recovery furnaces into the white cooking liquor. This is then reused to start the digestion process over again. The plant has two recovery boilers, four lime kilns, and three paper machines with all of the peripheral equipment required by the kraft process. The Fiber Optimization and Raw Material Management Transfer System (FORMM) at the facility allows M2Green to more efficiently use the raw materials available by screening the materials more thoroughly. This system also provides for a more efficient use of chips and sawdust delivered to the plant.

B. Facility History

The facility is located approximately 10 miles northwest of Missoula. The plant underwent a major expansion during the mid-1970s, which added several New Source Performance Standards (NSPS) units. The basic plant capacity was designed for about 1850 tons per day of air-dried pulp. An air quality permit covered individual units at that time. In 1987, the permit was revised to allow Stone Container Corporation (Stone) to burn petroleum coke in all four lime kilns. In 1989, the permit was revised again to allow Stone to install and operate a recycled cardboard facility at the plant. This revision increased the capacity of the plant by approximately 400 air-dried tons per day.

On July 1, 1987, the Environmental Protection Agency (EPA) promulgated new ambient air quality standards for particulate matter with an aerodynamic diameter of 10 microns or less (PM_{10}). The annual standard is 50 micrograms per cubic meter and the 24-hour standard is 150 micrograms per cubic meter. These standards were adopted by the Montana Board of Health and Environmental Sciences on April 15, 1988.

Due to violations of these standards, Missoula was designated as a PM_{10} nonattainment area. As a result of this designation, the Montana Department of Health and Environmental Sciences (Department, now the Department of Environmental Quality) and the Missoula County Air Pollution Control Agency were required to develop a plan to control these emissions and bring the area into compliance with the federal and state ambient air quality standards.

The mill's recovery boilers were identified as significant contributors to this area through the identification of contributing emission sources. **Montana Air Quality Permit (MAQP) #2589-M** was a modification to add general fugitive dust control measures to this facility and to correct emission limitations for the #5 Recovery Boiler and the #4 Lime Kiln to agree with NSPS limits. These corrections decreased the allowable emissions enough to satisfy the State Implementation Plan (SIP) control plan for the area.

Stone requested an alteration to their permit to allow for the installation of a new FORMM System. This permit allowed the construction of the new screening room and the addition of the needed fugitive sources to allow Stone to better use the raw materials available and was given **MAQP #2589-02.**

In August of 1992, the EPA submitted comments on the Missoula SIP concerning a completeness determination and requesting additional information. In response to EPA's concern about the correlation between opacity and mass emissions, the Air Quality Division modified Stone's permit to clarify the language in the permit. The Air Quality Division also addressed the opacity requirements for the equipment at the mill and the opacity monitor range for the #5 Recovery Boiler. This permit was given **MAQP #2589-03.**

In April 1994, Stone applied for **MAQP #2589-04**, which allowed for change to be made in the existing FORMM system. The FORMM transfers the fines from the chip screens and the fines from the sawdust screens to the hog fuel pile. This alteration allowed Stone to transfer material from the FORMM, via an enclosed belt conveyor, to an enclosed storage bin, rather than to the hog fuel pile. This material could then be transferred to trucks for distribution off site. To accomplish this, construction of a storage bin, a storage bin unloading system, and an enclosed belt conveying system was needed. This proposed system and the existing system cannot be physically operated at the same time, but rather can be operated interchangeably. This alteration resulted in a net decrease in total particulate emissions of 44.09 tons per year (tpy) and a net decrease in PM_{10} emissions of 15.89 tpy.

In addition to the change in the FORMM system, the permit also reflected the fact that in June 1992 Stone replaced the existing #2 Lime Slaker with a larger lime slaker. The new #2 Lime Slaker has a maximum capacity of 550 gallons per minute (gpm) of green liquor and is controlled by a natural draft wet scrubber. The new #2 Lime Slaker has the same permit limits as the previous slaker, because the emissions would not increase since the vapor velocity in the new slaker is lower than the vapor velocity of the old slaker.

On March 24, 1995, Stone applied for MAQP #2589-05, to allow the mill to utilize dewatered sludge from the sludge dewatering facility as fuel for the existing waste fuel and hog fuel boilers at the facility. Both boilers have an alkaline scrubber for control; therefore, this change in fuel would result in a maximum actual emission increase of 17.5 tpy of sulfur dioxide (SO_2). Stone still had to comply with the existing facility-wide SO_2 limit of 5000 lb/day. There was no increase in emissions of oxides of nitrogen (NO_x), total suspended particulate (TSP), PM_{10}, carbon monoxide (CO), or volatile organic compounds (VOCs) as a result of this change in fuel. A more detailed description of the change is included in the analysis for MAQP #2589-05. **MAQP #2589-05** replaced MAQP #2589-04.

MAQP Alteration #2589-06 was issued on February 25, 1996, and allowed Stone to replace the existing third press in the #3 Paper Machine with a shoe press. The change increased the quality of the linerboard produced and allowed the machine to be operated at

a higher production rate, from the current capacity of 59.6 tons of air-dried pulp per hour to 64.8 tons air-dried pulp per hour. The permit alteration also limited the yearly production of the #3 Paper Machine. Minor wording changes were also made to the permit at the mill's request. A more detailed description of the change is included in the analysis for MAQP #2589-06.

On June 7, 1996, Stone was issued MAQP #2589-07 for modifications to the existing scrubbing system on the #4 Smelt Dissolver. A venturi scrubber was added prior to the current scrubber and before the internal design and packing of the current scrubber was modified. The allowable emissions from the dissolver did not change as a result of this action. However, because the new system operates with an increased efficiency, actual particulate emissions from the dissolver were expected to decrease by 9 tpy. **MAQP #2589-07** replaced MAQP #2589-06.

On December 14, 1999, Stone applied for MAQP #2589-08, an alteration to MAQP #2589-07. Stone requested the alteration to include conditions for a thermal oxidizer to be installed as part of the Maximum Achievable Control Technology (MACT) I Cluster Rule requirements. Stone is subject to 40 Code of Federal Regulations (CFR) 63, Subpart S (MACT I), for the pulp and paper industry. In order to comply with the regulations, Stone proposed to install and operate a steam stripper and a thermal oxidizer. The Department approved the project as a pollution control project (PCP) under the Prevention of Significant Deterioration (PSD) regulations. The Department reviewed the project and the 1994 EPA memo entitled *Pollution Control Projects and New Source Review (NSR) Applicability*, and determined that the project will be environmentally beneficial.

However, the potential emissions for NO_x were determined to exceed the significance levels under the PSD regulations. Stone conducted modeling to determine the impacts of the NO_x emissions. The Department reviewed the modeling results, along with previous modeling completed by Stone, and determined that the thermal oxidizer would not cause or contribute to a violation of the national ambient air quality standards, PSD increment, or adversely affect visibility or other air quality related values.

The project also included other activities such as construction of the LVHC-non-condensible gas (NCG) system and re-configuration of the batch digestor vent. The permit format and the rule references were updated, as well as updates to conditions in which the Administrative Rule of Montana (ARM) 17.8.321 (Kraft Pulp Mills) applies. **MAQP #2589-08** replaced MAQP #2589-07.

Stone submitted a complete permit application on December 27, 2000, for the installation and operation of seven temporary, diesel-fired generators at their facility. This application was assigned MAQP #2589-09. Stone asserted that the generators were necessary because the high cost of electricity had significantly impacted operations at Stone, forcing a reduction in manufacturing at the Frenchtown facility. The operation of the generators would not occur beyond 2 years and was not expected to last for an extended period of time, but rather only for the length of time necessary for Stone to acquire a permanent, more economical supply of power. Integral to the diesel generators are the electronic engine controls (EEC) and intake air cooling (IAC) for NO_x emission control.

The temporary generators would only be used when commercial power is too expensive and is impacting mill operations; therefore, the amount of emissions expected during the actual operation of these generators was not anticipated to be major. In addition, the installation of these generators qualifies as a "temporary source" under the PSD permitting program because the permit would limit the operation of these generators to a time period

of less than 2 years. As a result, Stone would not need to comply with ARM 17.8.804, 17.8.820, 17.8.822, and 17.8.824. Even though the portable generators were considered temporary, the Department required compliance with Best Available Control Technology (BACT) and public notice requirements; therefore, compliance with ARM 17.8.819 and 17.8.826 would be ensured. **MAQP #2589-09** replaced MAQP #2589-08.

MAQP #2589-10 was issued on September 9, 2003, for the proposed installation of a replacement chip-meter and low-pressure feeder for Stone's existing Chip Kamyr digester (Kamyr). Stone proposed changes to the chip bin to allow installation of the replacement chip-meter. The replacement of the Kamyr's chip-meter would allow that digester to increase its production. Stone intended to increase production of the Kamyr, while curtailing the other digesters. If such an increase in production were to be evaluated with respect to the full potential utilization of the other digesters with the Kamyr, a PSD review may be required. To ensure that the Kamyr project would not increase Stone's potential emissions above the PSD significance level, Stone proposed a mill-wide limitation of 535,000 oven dry tons (ODT) of wood pulp production per year. The Kamyr, when compared with the combined production of the digester systems, produces the highest pulp quality at the highest pulp yield and uses the least steam per ton of pulp, resulting in less black liquor solids generation per ton of pulp. Therefore, actual emissions resulting from the implementation of this project were expected to decrease.

Potential emissions for the 535,000 ODT of wood pulp production per year were calculated using emission factors for the Kamyr digester alone, as this represents the most likely scenario. However, Stone retains the ability to operate the other digesters as they are currently permitted, either alone, or in combination with the Kamyr. **MAQP #2589-10** replaced MAQP #2589-09.

Stone submitted a request for permit amendment on December 12, 2002, to make the MAQP #2589-10 consistent with the Title V Operating Permit (#OP2589-01). In addition, Stone submitted de minimis requests on April 21, 2003; August 8, 2003; and September 10, 2003, which will be incorporated into the MAQP. A more detailed description of the change is included in the analysis for MAQP #2589-10. **MAQP #2589-11** replaced MAQP #2589-10.

Smurfit-Stone submitted a request for a permit amendment on October 1, 2004, of MAQP #2589-11. Smurfit-Stone requested a name change from Stone to Smurfit-Stone. **MAQP #2589-12** replaced MAQP #2589-11.

On October 3, 2005, the Department received an application from Smurfit-Stone for a significant modification to #OP2589-03 as well as a de minimis notification. Smurfit-Stone was to comply with the high volume, low concentration (HVLC) non-condensable gas (NCG) requirements in 40 CFR 63, Subpart S, National Emissions Standards for Hazardous Air Pollutants for the Pulp and Paper Industry (commonly referred to as MACT I, Phase II). MACT I, Phase II required collection and treatment of emissions from specified HVLC-NCG sources. The compliance date for the HVLC-NCG (MACT I, Phase II) requirements was April 17, 2006. The significant modification to #OP2589-03 was to remove the requirement to vent the brown stock washer emissions through wet scrubbers as well as to include the HVLC-NCG collection and treatment requirements.

Smurfit-Stone notified the Department to remove the requirement to operate the brown stock washer scrubbers from MAQP #2589-12. The purpose of Smurfit-Stone's requirement to operate wet scrubbers on the washer exhausts was the control of particulate emissions. For the following reasons, Smurfit-Stone believed the requirement to be

unnecessary after installation, as part of the HVLC-NCG collection system, of the new low-infiltration washer hoods, whether the HVLC-NCG collection system was operating or not. The HVLC-NCG system was specifically designed for the collection and treatment of gaseous Hazardous Air Pollutants (HAPs). The introduction of significant amounts of particulate (fiber) into the system resulted in plugging and failure of the HVLC cooler and entrainment separators, as well as fiber buildup on the HVLC Booster Fan, HVLC DFO fan and doctor blade fans resulting in fan imbalance and potential failure.

A significant portion of the MACT I, Phase II project was the installation of new low-infiltration washer hoods on the top and base stock washers. The purpose of the new hoods was to reduce air infiltration into the hoods to minimize the volume of the HVLC-NCGs that was needed to be transported and treated. Because particulate that was present in the HVLC system would result in severe operational problems, significant design features were incorporated into the new hoods to prevent the introduction of particulate into the HVLC-NCG collection system. The design features included:

- Minimized air leakage into the hoods. Because the hoods were designed to minimize air leakage into the hood, the volume of air that was to be evacuated from the hood was much less than in the current design. This lower airflow into, and subsequently out of, the hood reduced turbulence within the hood and nimimized the entrainment of fiber that may have become airborne as a result of the operation of the air doctors, which pneumatically removed the fiber sheet from the drum.

- Locating the air outlet at the top of the washer hood, approximately 6 feet above the washer drum. The location allowed any large wet fibers that may have become airborne as a result of the operation of the air doctors time to drop out prior to entering the outlet. In the current hoods, the air outlet from the hood is located very near the drum and air doctors resulting in the potential for fiber entrainment.

- In the hood design the air outlet intake was through a perforated plenum that runs the entire length of the top of washer hood. The perforated plenum design – consisting of 4-inch holes spaced every foot - resulted in very low capture velocities to prevent entrainment of the fiber particles. The hood design did not have a plenum, but a single round suction inlet resulting in significantly higher capture velocities.

- The outlet of the hood exhaust plenum incorporated a vertical "dam" consisting of about a 2-inch lip, which removed any entrained moisture and fiber that may enter the plenum.

- Though Smurfit-Stone did not anticipate any fiber leaving the washer hood, the outlet of the hood exhaust plenum raises about 10 feet in elevation to the HVLC header exiting the Brown Stock Washer building. This elevation increase was to further remove any entrained moisture and fiber (by gravity) that may have entered the HVLC piping.

As discussed above, it is critical to the operation and maintenance of the HVLC system that fiber does not enter the HVLC piping due to resulting fouling of the air doctor fan system, gas cooler, entrainment separators, and HVLC fans.

Because of the above mentioned design features of the new low-infiltration hoods, and the large, wet particle configuration of any airborne fiber that would be generated by the operation of the air doctors, the particulate emissions from the washer hoods entering the HVLC system, although not quantified, was expected to be insignificant. This would be the case both during operation of the HVLC-NCG collection system and during

malfunctions of the HVLC-NCG collections system when the emissions from the washers are vented to the atmosphere. Therefore, Smurfit-Stone believed, once the new hoods were installed, the requirement to operate wet scrubbers to control particulate emissions from the washers should be removed.

This permit action incorporated Smurfit-Stone's request to remove the requirement to operate wet scrubbers to control particulate emissions from the washers in the MAQP according to the provisions of ARM 17.8.745. **MAQP #2589-13** replaced MAQP #2589-12.

On November 14, 2008, the Department received a complete application from Smurfit-Stone to modify MAQP #2589-13. In this application, Smurfit-Stone requested to install a 300-ton capacity soda ash storage silo with an associated pneumatic truck unloading station and mixing equipment to mix dry soda ash into a solution suitable for addition to green liquor.

To replace sodium losses in the pulping process, the mill used caustic in liquid form as a make-up chemical. Caustic though, was becoming increasingly more expensive and difficult to acquire. In response to the increasing costs and decreasing availability of caustic, the mill intended to install a soda ash system for use as a make-up chemical.

In addition, Smurfit-Stone requested several administrative amendment changes to its Title V Operating permit in its renewal application received by the Department on June 12, 2006. The requested changes also necessitated administrative changes to Smurfit-Stone's MAQP. These amendments included the removal of several units that are no longer in service: the No. 3 Recovery Boiler, No. 3 Smelt Dissolving Tank, and the pin chip pile and digester cyclone and other various clarifications. Also, on September 30, 2008, the Department approved Smurfit-Stone's request to discontinue ambient monitoring of PM_{10}. The Department has updated the permit to reflect these changes. **MAQP #2589-14** replaced MAQP #2589-13.

On November 19, 2009, the Department received an administrative amendment request letter from Smurfit-Stone to modify MAQP #2589-14. In this letter, Smurfit-Stone requested that the Department update the MAQP to reflect changes in some emissions testing schedules and compliance demonstration practices that the Department and Smurfit-Stone agreed to and implemented during the most recent renewal of their Title V Operating Permit which became final on August 20, 2009. The Technical Review Document associated with Operating Permit (OP) #OP2589-06 provided a summary of the dialogue between Smurfit-Stone and the Department regarding the changes in the Summary of Public Comments. These changes are as follows:

1. The sulfur content analysis of the dewatered sludge used as fuel for the Multi-fuel boiler was changed from quarterly testing to annual testing.

2. The frequency of TSP and PM_{10} source testing requirements for #1, #2, #3, and #4 Lime Kilns was changed from annual testing to once every two years.

3. The frequency of TSP and PM_{10} source testing requirements for the #3 Lime Slaker was changed from annual testing to as required by the Department.

4. The method of demonstrating compliance for Total Reduced Sulfur (TRS) for the #4 Recover Boiler was changed from the Continuous Emission Monitoring System (CEMS) to source testing once every two years.

5. The method of demonstrating compliance for TRS for the #1, #2, and #3 Lime Kilns was changed from CEMS to source testing once every two years.

The Department updated the MAQP to reflect these changes.

In addition, on January 6, 2010, the Department received an administrative amendment request from Smurfit-Stone to include provisions allowing the discontinuation of ambient monitoring for hydrogen sulfide (H_2S) following the shutdown of the Mill's Waste Water Treatment System (WWTS). The shutdown of the WWTS was anticipated to follow the shutdown of the Missoula Mill and all of its emitting units. The Department updated the MAQP with respect to specific timing for the discontinuation of ambient monitoring. **MAQP #2589-15** replaced MAQP #2589-14 and became final on March 26, 2010.

C. Current Permit Action

On August 02, 2010, the Department an administrative amendment request from Smurfit-Stone Container Enterprises, Inc. to change the name of the facility to Smurfit-Stone Container Corporation. Because of the pending sale of the company, the Department did not update the request for the name change.

On June 10, 2011, the Department received an administrative amendment request from Smurfit-Stone Container Corporation ("SSCC") to transfer all ownership of the Montana Air Quality Permit #2589 to M2Green Redevelopment LLC ("M2Green"). On May 3, 2011, SSCC sold the Missoula Mill to M2Green, and M2Green has agreed to assume the responsibility, coverage, and liability for the Montana Air Permits as of May 3, 2011. The Department has updated the MAQP to reflect these changes.

D. Additional Information

Additional information, such as applicable rules and regulations, BACT/Reasonably Available Control Technology (RACT) determinations, air quality impacts, and environmental assessments, is included in the analysis associated with each change to the permit.

II. Applicable Rules and Regulations

The following are partial explanations of some applicable rules and regulations that apply to the facility. The complete rules are stated in the ARM and are available, upon request, from the Department. Upon request, the Department will provide references for locations of complete copies of all applicable rules and regulations or copies where appropriate.

A. ARM 17.8, Subchapter 1 – General Provisions, including, but not limited to:

1. ARM 17.8.101 Definitions. This rule includes a list of applicable definitions used in this chapter, unless indicated otherwise in a specific subchapter.

2. ARM 17.8.105 Testing Requirements. Any person or persons responsible for the emission of any air contaminant into the outdoor atmosphere shall, upon written request of the Department, provide the facilities and necessary equipment, including instruments and sensing devices, and shall conduct tests, emission or ambient, for such periods of time as may be necessary using methods approved by the Department.

3. ARM 17.8.106 Source Testing Protocol. The requirements of this rule apply to any emission source testing conducted by the Department, any source, or other entity as required by any rule in this chapter, or any permit or order issued pursuant to this chapter, or the provisions of the Clean Air Act of Montana, 75-2-101, *et seq.*, Montana Code Annotated (MCA).

   M2Green shall comply with the requirements contained in the Montana Source Test Protocol and Procedures Manual, including, but not limited to, using the proper test methods and supplying the required reports. A copy of the Montana Source Test Protocol and Procedures Manual is available from the Department upon request.

4. ARM 17.8.110 Malfunctions. (2) The Department must be notified promptly by telephone whenever a malfunction occurs that can be expected to create emissions in excess of any applicable emission limitation, or to continue for a period greater than 4 hours.

5. ARM 17.8.111 Circumvention. (1) No person shall cause or permit the installation or use of any device or any means that, without resulting in reduction in the total amount of air contaminant emitted, conceals or dilutes an emission of air contaminant that would otherwise violate an air pollution control regulation. (2) No equipment that may produce emissions shall be operated or maintained in such a manner that a public nuisance is created.

B. ARM 17.8, Subchapter 2 – Ambient Air Quality, including, but not limited to:

1. ARM 17.8.204 Ambient Air Monitoring
2. ARM 17.8.210 Ambient Air Quality Standards for Sulfur Dioxide
3. ARM 17.8.211 Ambient Air Quality Standards for Nitrogen Dioxide
4. ARM 17.8.212 Ambient Air Quality Standards for Carbon Monoxide
5. ARM 17.8.213 Ambient Air Quality Standard for Ozone
6. ARM 17.8.214 Ambient Air Quality Standard for Hydrogen Sulfide
7. ARM 17.8.220 Ambient Air Quality Standard for Settled Particulate Matter
8. ARM 17.8.221 Ambient Air Quality Standard for Visibility
9. ARM 17.8.222 Ambient Air Quality Standard for Lead
10. ARM 17.8.223 Ambient Air Quality Standard for PM_{10}

M2Green must comply with all applicable ambient air quality standards.

C. ARM 17.8, Subchapter 3 – Emission Standards, including, but not limited to:

1. ARM 17.8.304 Visible Air Contaminants. This rule requires that no person may cause or authorize emissions to be discharged to an outdoor atmosphere from any source installed after November 23, 1968, that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes.

2. ARM 17.8.308 Particulate Matter, Airborne. (1) This rules requires an opacity limitation of less than 20% for all fugitive emission sources and that reasonable precaution be taken to control emissions of airborne particulate matter. (2) Under this rule, M2Green shall not cause or authorize the use of any street, road, or parking lot without taking reasonable precautions to control emissions of airborne particulate matter.

3. ARM 17.8.309 Particulate Matter, Fuel Burning Equipment. This rule requires that no person shall cause, allow, or permit to be discharged into the atmosphere particulate matter caused by the combustion of fuel in excess of the amount determined by this rule.

4. ARM 17.8.310 Particulate Matter, Industrial Process. This rule requires that no person shall cause, allow, or permit to be discharged into the atmosphere particulate matter in excess of amount set forth in this rule.

5. ARM 17.8.316 Incinerators. This rule requires that no person may cause of authorize emissions to be discharged into the outdoor atmosphere from any incinerator, particulate matter in excess of 0.10 grains per standard cubic foot of dry flue gas, adjusted to 12% carbon dioxide and calculated as if no auxiliary fuel had been used. Further, no person shall cause or authorize to be discharged into the outdoor atmosphere from any incinerator emissions that exhibit an opacity of 10% or greater averaged over 6 consecutive minutes.

6. ARM 17.8.321 Kraft Pulp Mill. This rule applies to Kraft Pulp Mills operated in Montana. The rule contains exceptions to the opacity standards contained in this chapter, as well as additional requirement for Kraft Pulp Mills. M2Green is required to comply with the requirements of the Kraft Pulp Mill rule.

7. ARM 17.8.322 Sulfur Oxide Emissions – Sulfur in Fuel. (4) Commencing July 1, 1972, no person shall burn liquid or solid fuels containing sulfur in excess of 1 pound of sulfur per million Btu fired. (5) Commencing July 1, 1971, no person shall burn any gaseous fuel containing sulfur compounds in excess of 50 grains per 100 cubic feet of gaseous fuel, calculated as hydrogen sulfide at standard conditions.

8. ARM 17.8.324 Hydrocarbon Emissions—Petroleum Products. (3) No person shall load or permit the loading of gasoline into any stationary tank with a capacity of 250 gallons or more from any tank truck or trailer, except through a permanent submerged fill pipe, unless the tank is equipped with a vapor loss control device as described in (1) of this rule.

9. ARM 17.8.340 Standard of Performance for New Stationary Sources and Emission Guidelines for Existing Sources. This rule incorporates, by reference, 40 CFR Part 60, NSPS. M2Green is considered an NSPS affected facility under 40 CFR Part 60 and is subject to the requirements of the following subparts:

   a. 40 CFR 60, Subpart A – General Provisions. This subpart applies to all affected equipment or facilities subject to an NSPS subpart listed below.

   b. 40 CFR 60, Subpart D – Standards of Performance Fossil Fuel Fired Steam Generators. This subpart applies to the Multi-fuel Boiler because it is a fossil-fuel-fired steam generator with a heat input capacity greater than 250 MMBtu/hr that commenced construction after August 17, 1971.

   c. 40 CFR 60, Subpart BB – Standards of Performance for Kraft Pulp Mills. This subpart would apply to the #5 Recovery Boiler, #4 Lime Kiln, and #5 Smelt Dissolving Tank because M2Green is a Kraft pulp mill and these units are listed as affected facilities that commenced construction or modification after September 24, 1976.

10. ARM 17.8.342 Emission Standards for Hazardous Air Pollutants for Source Categories. The source, as defined and applied in 40 CFR Part 63, shall comply with the requirements of 40 CFR Part 63, as listed below:

a. 40 CFR 63, Subpart A – General Provisions. This subpart applies to all equipment or facilities subject to an MACT Subpart as listed below.

b. 40 CFR 63, Subpart S – Cluster Rule for the Pulp and Paper Industry

c. 40 CFR 63, Subpart MM – National Emission Standards for Hazardous Air Pollutants for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mills

D. ARM 17.8, Subchapter 4 – Stack Height and Dispersion Techniques, including, but not limited to:

1. ARM 17.8.401 Definitions. This rule includes a list of definitions used in this chapter, unless indicated otherwise in a specific subchapter.

2. ARM 17.8.402 Requirements. M2Green must demonstrate compliance with the ambient air quality standards with a stack height that does not exceed Good Engineering Practices (GEP). The proposed height of the new or altered stack for M2Green is below the allowable 65-meter GEP stack height.

E. ARM 17.8, Subchapter 5 – Air Quality Permit Application, Operation, and Open Burning Fees, including, but not limited to:

1. ARM 17.8.504 Air Quality Permit Application Fees. This rule requires that an applicant submit an air quality permit application fee concurrent with the submittal of an air quality permit application. A permit application is incomplete until the proper application fee is paid to the Department. The current permitting action is considered an administrative amendment; therefore, no application fee is required.

2. ARM 17.8.505 Air Quality Operation Fees. An annual air quality operation fee must, as a condition of continued operation, be submitted to the Department by each source of air contaminants holding an air quality permit, excluding an open burning permit, issued by the Department. The air quality operation fee is based on the actual or estimated actual amount of air pollutants emitted during the previous calendar year.

An air quality operation fee is separate and distinct from an air quality permit application fee. The annual assessment and collection of the air quality operation fee, described above, shall take place on a calendar-year basis. The Department may insert into any final permit issued after the effective date of these rules, such conditions as may be necessary to require the payment of an air quality operation fee on a calendar-year basis, including provisions that pro-rate the required fee amount.

F. ARM 17.8, Subchapter 7 – Permit, Construction, and Operation of Air Contaminant Sources, including, but not limited to:

1. ARM 17.8.740 Definitions. This rule is a list of applicable definitions used in this chapter, unless indicated otherwise in a specific subchapter.

2. ARM 17.8.743 Montana Air Quality Permits – When Required. This rule requires a person to obtain an air quality permit or permit modification to construct, install, modify, or operate any air contaminant sources that have the Potential to Emit (PTE) more than 25 tons per year of any pollutant. M2Green has s PTE greater than 25 tons per year of PM_{10}, NO_x, SO_2, CO and VOCs; therefore an air quality permit is required.

3. ARM 17.7.744 Montana Air Quality Permits – General Exclusions. This rule identifies the activities that are not subject to the Montana Air Quality Permit program.

4. ARM 17.8.745 Montana Air Quality Permits – Exclusion for De Minimis Changes. This rule identifies the de minimis changes at permitted facilities that do not require a permit under the Montana Air Quality Permit Program.

5. ARM 17.8.748 New or Modified Emitting Units – Permit Application Requirements. (1) This rule requires that a permit application be submitted prior to installation, alteration, or use of a source. The current permitting action is considered to be an administrative amendment; therefore, no application is required. (7) This rule requires that the applicant notify the public by means of legal publication in a newspaper of general circulation in the area affected by the application for a permit. The current permitting action is considered to be an administrative amendment; therefore, no public notice is required.

6. ARM 17.8.749 Conditions for Issuance or Denial of Permit. This rule requires that the permits issued by the Department must authorize the construction and operation of the facility or emitting unit subject to the conditions in the permit and the requirements of this subchapter. This rule also requires that the permit must contain any conditions necessary to assure compliance with the Federal Clean Air Act (FCAA), the Clean Air Act of Montana, and rules adopted under those acts.

7. ARM 17.8.752 Emission Control Requirements. This rule requires a source to install the maximum air pollution control capability that is technically practicable and economically feasible, except that BACT shall be utilized. The required BACT analysis is included in Section III of this permit analysis.

8. ARM 17.8.755 Inspection of Permit. This rule requires that air quality permits shall be made available for inspection by the Department at the location of the source.

9. ARM 17.8.756 Compliance with Other Requirements. This rule states that nothing in the permit shall be construed as relieving M2Green of the responsibility for complying with any applicable federal or Montana statute, rule, or standard, except as specifically provided in ARM 17.8.740, *et seq*.

10. ARM 17.8.759 Review of Permit Applications. This rule describes the Department's responsibilities for processing permit applications and making decisions on those permit applications that do not require the preparation of an environmental impact statement.

11. ARM 17.8.762 Duration of Permit. An air quality permit shall be valid until revoked or modified, as provided in this subchapter, except that a permit issued prior to construction of a new or altered source may contain a condition providing that the permit will expire unless construction is commenced within the time specified in the permit, which in no event may be less than 1 year after the permit is issued.

12. ARM 17.8.763 Revocation of Permit. An air quality permit may be revoked upon written request of the permittee, or for violations of any requirement of the Clean Air Act of Montana, rules adopted under the Clean Air Act of Montana, the FCAA, rules adopted under the FCAA, or any applicable requirement contained in the Montana SIP.

13. ARM 17.8.764 Administrative Amendment to Permit. An air quality permit may be amended for changes in any applicable rules and standards adopted by the Board of Environmental Review (Board) or changed conditions of operation at a source or stack that do not result in an increase of emissions as a result of those changed conditions. The owner or operator of a facility may not increase the facility's emissions beyond permit limits unless the increase meets the criteria in ARM 17.8.745 for a de minimis change not requiring a permit, or unless the owner or operator applies for and receives another permit in accordance with ARM 17.8.748, ARM 17.8.749, ARM 17.8.752, ARM 17.8.755, and ARM 17.8.756, and with all applicable requirements in ARM Title 17, Chapter 8, Subchapters 8, 9, and 10.

14. ARM 17.8.765 Transfer of Permit. This rule states that an air quality permit may be transferred from one person to another if written notice of Intent to Transfer, including the names of the transferor and the transferee, is sent to the Department.

15. ARM 17.8.770 Additional Requirements for Incinerators. This rule specifies the additional information that must be submitted to the Department for incineration facilities subject to 75-2-215, MCA.

G. ARM 17.8, Subchapter 8 – Prevention of Significant Deterioration of Air Quality, including, but not limited to:

1. ARM 17.8.801 Definitions. This rule is a list of applicable definitions used in this subchapter.

2. ARM 17.8.818 Review of Major Stationary Sources and Major Modifications--Source Applicability and Exemptions. The requirements contained in ARM 17.8.819 through ARM 17.8.827 shall apply to any major stationary source and any major modification with respect to each pollutant subject to regulation under the FCAA that it would emit, except as this subchapter would otherwise allow.

   M2Green is a "major stationary source" because it is a listed source and has a PTE greater than 100 tons per year of any pollutant. The current permit action is considered an administrative permit action and does not involve any increase in emissions.

H. ARM 17.8, Subchapter 12 – Operating Permit Program Applicability, including, but not limited to:

1. ARM 17.8.1201 Definitions. (23) Major Source under Section 7412 of the FCAA is defined as any stationary source having:

   a. PTE > 100 tons/year of any pollutant;

   b. PTE > 10 tons/year of any one Hazardous Air Pollutant (HAP), PTE > 25 tons/year of a combination of all HAPs, or lesser quantity as the Department may establish by rule; or

   c. PTE > 70 tons/year of PM_{10} in a serious PM_{10} nonattainment area.

2. ARM 17.8.1204 Air Quality Operating Permit Program Applicability. (1) Title V of the FCAA Amendments of 1990 requires that all sources, as defined in ARM 17.8.1204 (1), obtain a Title V Operating Permit. In reviewing and issuing MAQP #2589-16 for M2Green, the following conclusions were made:

   a. The facility's PTE is greater than 100 tons/year for PM_{10}, SO_2, NO_x, CO, and VOCs.

   b. The facility's PTE is greater than 10 tons/year of any one HAP and greater than 25 tons/year of all HAPs.

   c. This source is not located in a serious PM_{10} nonattainment area.

   d. This facility is subject to current NSPS standards (40 CFR 60, Subparts D and BB).

   e. This facility is subject to current NESHAP standards (40 CFR 63, Subparts S and MM).

   f. This source is not a Title IV affected source.

   g. This source is not an EPA designated Title V source.

   Based on these facts, the Department has determined that M2Green is a major source of emissions as defined under Title V. M2Green's Title V Operating Permit #OP2589-06 was issued final and effective on August 20, 2009. The Title V permit will also be amended to reflect the changes in ambient monitoring requirements.

I. MCA 75-2-103, Definitions provides in part as follows:

1. An incinerator means any single or multiple-chambered combustion device that burns combustible material, alone or with a supplemental fuel or catalytic combustion assistance, primarily for the purpose of removal, destruction, disposal, or volume reduction of all or any portion of the input material.

2. Solid waste means all putrescible and nonputrescible solid, semisolid, liquid, or gaseous wastes including, but not limited to... air pollution control facilities...

J. MCA 75-2-215, Solid or hazardous waste incineration -- additional permit requirements including, but not limited to, the following requirements: The Department may not issue a permit to a facility until: (d) the Department has reached a determination that the projected emissions and ambient concentrations will constitute a negligible risk to the public health, safety, and welfare and to the environment.

III. BACT Determination

A BACT determination is required for each new or altered source. M2Green shall install on the new or altered source the maximum air pollution control capability, which is technically practicable and economically feasible, except that BACT shall be utilized.

A BACT analysis was not required for the current permit action because the current permit action is considered an administrative permit action.

IV. Emission Inventory

Previous emission inventories completed are on file with the Department. This action is an administrative action and does not involve any emissions increases; therefore, no emission inventory information was included.

V. Existing Air Quality

The Missoula area is currently a nonattainment area for PM_{10} standards. M2Green is a source outside the nonattainment area that has been shown to impact the area. The Missoula CO nonattainment area was reclassified to attainment in August 2007. There will be no changes to potential emissions from M2Green as a result of the current permit action.

VI. Ambient Air Monitoring Plan

M2Green shall conduct ambient monitoring as described in Attachment 1. On July 15, 2008, the Department received a request from Smurfit-Stone to discontinue ambient monitoring of PM_{10} based on past monitoring results. The Department reviewed this request and on September 30, 2008 issued a decision to discontinue PM_{10} ambient monitoring at Sites #1A and #2A effective immediately. As stated in that decision, the Department retains the right to require ambient monitoring of PM_{10} in the future if the Department believes there may be a violation of the standard attributed to Smurfit-Stone's Missoula Mill. The current permit action includes language allowing discontinuation of H_2S ambient monitoring as of September 30th following the complete shutdown of permitted emitting units at Smurfit-Stone. The Department retains the right to reevaluate that discontinuation date in the event of any violations of the H_2S standard prior to the September 30th date. In addition, the Department also reserves to right to reevaluate whether or not H_2S ambient monitoring would be necessary following the restarting of any emitting units at M2Green.

VII. Ambient Air Impact Analysis

The current permit action does not increase allowable emissions for the facility. Therefore, no air quality impacts will be seen from the current permit action.

VIII. Takings or Damaging Implication Analysis

As required by 2-10-105, MCA, the Department conducted the following private property taking and damaging assessment.

YES	NO	
X		1. Does the action pertain to land or water management or environmental regulation affecting private real property or water rights?
	X	2. Does the action result in either a permanent or indefinite physical occupation of private property?
	X	3. Does the action deny a fundamental attribute of ownership? (ex.: right to exclude others, disposal of property)
	X	4. Does the action deprive the owner of all economically viable uses of the property?
	X	5. Does the action require a property owner to dedicate a portion of property or to grant an easement? [If no, go to (6)].
		5a. Is there a reasonable, specific connection between the government requirement and legitimate state interests?
		5b. Is the government requirement roughly proportional to the impact of the proposed use of the property?
	X	6. Does the action have a severe impact on the value of the property? (consider economic impact, investment-backed expectations, character of government action)
	X	7. Does the action damage the property by causing some physical disturbance with respect to the property in excess of that sustained by the public generally?
	X	7a. Is the impact of government action direct, peculiar, and significant?
	X	7b. Has government action resulted in the property becoming practically inaccessible, waterlogged or flooded?
	X	7c. Has government action lowered property values by more than 30% and necessitated the physical taking of adjacent property or property across a public way from the property in question?
	X	Takings or damaging implications? (Taking or damaging implications exist if YES is checked in response to question 1 and also to any one or more of the following questions: 2, 3, 4, 6, 7a, 7b, 7c; or if NO is checked in response to questions 5a or 5b; the shaded areas)

Based on this analysis, the Department determined there are no taking or damaging implications associated with this permit action.

IX. Environmental Assessment

An environmental assessment was not required for this action because it is an administrative action.

Permit Analysis Prepared by: Shane Clary
Date: June 14, 2011

Major Industrial
Acute Bio-monitoring
Permit No.: MT0000035

MONTANA DEPARTMENT OF ENVIRONMENTAL QUALITY

AUTHORIZATION TO DISCHARGE UNDER THE
MONTANA POLLUTANT DISCHARGE ELIMINATION SYSTEM

In compliance with Montana Water Quality Act, Title 75, Chapter 5, Montana Code Annotated (MCA) and the Federal Water Pollution Control Act (the "Clean Water Act"), 33 U.S.C. § 1251 *et seq.*,

M2Green Redevelopment, LLC

is authorized to discharge from its **Frenchtown Mill Site**

located at **14377 Pulp Mill Road, Missoula, Missoula County, MT 59808**

to receiving waters named the **Clark Fork River**

in accordance with discharge point(s), effluent limitations, monitoring requirements and other conditions set forth hercin. Authorization for discharge is limited to those outfalls specifically listed in the permit. The Smurfit-Stone Container Enterprises, Inc., iu conjunction with other parties in the Clark Fork River basin, has entered into a Voluntary Nutrient Reduction Program that has been approved by the U.S. Environmental Protection Agency in accordance with Section 303(d) of the Clean Water Act.

This permit shall become effective: September 1, 2000.

This permit and the authorization to discharge shall expire at midnight, May 31, 2005.

FOR THE MONTANA DEPARTMENT OF
ENVIRONMENTAL QUALITY

Jenny Chambers, Chief
Water Protection Bureau
Permitting & Compliance Division

Modification Date: June 16, 2011

TABLE OF CONTENTS

I. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

A. Definitions

1. The "**30-day (and monthly) average,**" is the arithmetic average of all samples collected during a consecutive 30-day period or calendar month, whichever is applicable. The calendar month shall be used for purposes of reporting self-monitoring data on discharge monitoring report forms.

2. The "**Annual Average Load**" is the arithmetic mean of all 30-day or monthly average loads reported during the calendar year for a monitored parameter.

3. "**Acute Toxicity**" occurs when 50 percent or more mortality is observed for either species (See Part I.C of this permit.) at any effluent concentration. Mortality in the control must simultaneously be 10 percent or less for the effluent results to be considered valid.

4. "**BOD_5**" is the five-day measure of pollutant parameter biochemical oxygen demand.

5. "**Bypass**" means the intentional diversion of waste streams from any portion of a treatment facility.

6. "**$CBOD_5$**" is the five-day measure of pollutant parameter carbonaceous biochemical oxygen demand.

7. "**Composite samples**" shall be flow proportioned. The composite sample shall, as a minimum, contain at least four (4) samples collected over the compositing period. Unless otherwise specified, the time between the collection of the first sample and the last sample shall not be less than six (6) hours nor more than 24 hours. Acceptable methods for preparation of composite samples are as follows:

   a. Constant time interval between samples, sample volume proportional to flow rate at time of sampling;

   b. Constant time interval between samples, sample volume proportional to total flow (volume) since last sample. For the first sample, the flow rate at the time the sample was collected may be used;

   c. Constant sample volume, time interval between samples proportional to flow (i.e., sample taken every "X" gallons of flow); and,

   d. Continuous collection of sample, with sample collection rate proportional to flow rate.

8. " A "**Daily Maximum Limit**" specifies the maximum allowable discharge of a pollutant during a calendar day. Expressed as units of mass, the daily discharge is cumulative mass discharged over the course of the day. Expressed as a concentration, it is the arithmetic average of all measurements taken that day.

9. Department" means the Montana Department of Environmental Quality (MDEQ).

10. **"Direct Discharge"** means a discharge through outfalls 001, 002 or 003.

11. **"Director"** means the Director of the United States Environmental Protection Agency's Water Management Division.

12. **"EPA"** means the United States Environmental Protection Agency.

13. A **"grab"** sample, for monitoring requirements, is defined as a single "dip and take" sample collected at a representative point in the discharge or receiving stream.

14. An **"instantaneous"** measurement, for monitoring requirements, is defined as a single reading, observation, or measurement.

15. **"Load limits"** are mass-based discharge limits expressed in units such as lb/day.

16. A **"mixing zone"** is a limited area of a surface water body or aquifer where initial dilution of a discharge takes place and where water quality changes may occur. Also recognized as an area where certain water quality standards may be exceeded.

17. **"Nondegradation"** means the prevention of a significant change in water quality that lowers the quality of high-quality water for one or more parameters. Also, the prohibition of any increase in discharge that exceeds the limits established under or determined from a permit or approval issued by the Department prior to April 29, 1993.

18. The **"Regional Administrator"** is the administrator of the EPA Region with jurisdiction over federal water pollution control activities in the State of Montana.

19. **"Severe property damage"** means substantial physical damage to property, damage to the treatment facilities which causes them to become inoperable, or substantial and permanent loss of natural resources which can reasonably be expected to occur in the absence of a bypass. Severe property damage does not mean economic loss caused by delays in production.

20. Sewage Sludge" is any solid, semi-solid or liquid residue that contains materials removed from domestic sewage during treatment. Sewage sludge includes, but is not limited to, primary and secondary solids and sewage sludge products.

21. **"Total Nitrogen"** means the sum of Total Kjeldahl nitrogen plus , nitrate plus nitrite as nitrogen.

22. "TIE" is a toxicity identification evaluation.

23. "TRE" is a toxicity reduction evaluation.

24. The term "TMDL" means the total maximum daily load limitation of a parameter, representing the estimated assimilative capacity for a water body before other designated uses are adversely affected. Mathematically, it is the sum of wasteload allocations for point sources, load allocations for non-point and natural background sources, and a margin of safety.

25. "TSS" is the parameter total suspended solids.

26. "Upset" means an exceptional incident in which there is unintentional and temporary noncompliance with technology-based permit effluent limitations because of factors beyond the reasonable control of the permittee. An upset does not include noncompliance to the extent caused by operational error, improperly designed treatment facilities, inadequate treatment facilities, lack of preventive maintenance, or careless or improper operation.

B. Description of Discharge Points

The authorization to discharge provided under this permit is limited to those outfalls specifically designated below as discharge locations. Discharges at any location not authorized under an MPDES permit is a violation of the Montana Water Quality Act and could subject the person(s) responsible for such discharge to penalties under the Act. Knowingly discharging from an unauthorized location or failing to report an unauthorized discharge within a reasonable time from first learning of an unauthorized discharge could subject such person to criminal penalties as provided under Section 75-5-632 of the Montana Water Quality Act.

Outfall Serial Number	Description of Discharge Point
001	Discharge point 001 is a discharge pipe to the Clark Fork River located approximately 5,100 feet west of the plant site, Latitude 46°57'30", Longitude 114°13'30". The outfall discharges treated process wastewater from long-term storage ponds during periods of river flow greater than 4,000 cubic feet per second (cfs).
002	Discharge point 002 is a discharge pipe to the Clark Fork River located approximately 5,000 feet west of the plant site, Latitude 46°57'30", Longitude 114°13'30". The outfall discharges treated process wastewater from long-term storage ponds during periods of river flow greater than 4,000 cfs.
003	Discharge point 003 is a diffuser discharging to the Clark Fork River located approximately 8,400 feet northwest of the plant site, Latitude 46°57'45", Longitude 114°13'45". The diffuser enhances effluent mixing of treated process wastewater from long-term storage ponds at river flows greater than 1,900 cfs.
004	Discharge point 004 is uncontaminated, non-contact cooling water discharged to a surface ditch located north of and parallel to the Chicago, Milwaukee, St. Paul and Pacific railroad right-of-way. The ditch flows northwest of the plant for

approximately 11,000 feet before entering a tributary slough with a discharge to the river downstream of Outfall 003.

C. Specific Limitations and Self-Monitoring Requirements

1. Effluent Limitations and Discharge Conditions

Effective immediately and lasting through May 31, 2005, the permittee is authorized to discharge from outfall serial numbers 001, 002, 003, and 004 and by seepage. Such discharges shall be limited and conditioned as specified below.

(a) Outfalls 001, 002, 003 and Seepage
Specific discharge requirements are as follows. Whichever limitation provides the most stringent control shall govern.

(i) Color – When river color, as determined from samples collected at Harper's Bridge, is less than 15 standard color units (SCU), the combined flows from outfalls 001, 002, and 003 shall be regulated by the permittee to prevent an increase in river color between Harpers Bridge and Six-mile Station, as measured in accordance with Part I.C.2 (g) of this permit, greater than 5 SCU.

When river color, as determined from samples collected at Harper's Bridge, is equal to or greater than 15 SCU, the combined flows from outfalls 001, 002, and 003 shall be regulated by the permittee to prevent flows greater than that allowed by the following formula:

$$Qd = \frac{5Qr - .1855\,Sc}{Cd}$$

Qd	=	Allowable direct discharge flow in cfs
5	=	The instream color standard 5 SCU allowable increase
Qr	=	Clark Fork River flow in cfs at USGS station 12353000
Sc	=	Color (in lbs./day) contributed to the river from pond seepage (The estimate from current data is 30,000 lbs./day.)
Cd	=	Color in the direct discharge (SCU)
.1855	=	Conversion factor to convert lbs./day into cfs-SCU

(ii) The combined annual discharge shall not contain more than 4.74 pounds of total suspended solids per ton of off-machine production. ***The annual load for TSS shall not exceed:***

$$4.74 \frac{lbs}{ton} x\ P\ tons$$

Where P = total off-machine production for the year January 1 through December 31.

In no case shall the annual load of TSS exceed 2,500,000 pounds. Over a 3 year running average, the annual load of TSS shall not exceed 2,000,000 pounds.

(iii) Total annual discharge of BOD_5 in the direct discharge and seepage combined shall not exceed 2.66 pounds of BOD_5 per ton of off-machine production. ***The annual load for BOD_5 shall not exceed:***

$$\frac{2.66\ lbs}{ton} x\ P\ tons$$

P = total off-machine production for the year January 1 through December 31. In no case shall the annual load of BOD_5 exceed 2,100,000 pounds.

(iv) The direct discharge through points 001, 002, and 003 shall also comply with the concentration limitations in Table 1.

Table 1. BOD_5 and TSS concentration limitations.

Parameter	Collective Daily Max Concentration*	Collective 30-day Average Concentrations **
BOD_5	166 mg/L	85 mg/L
TSS	319 mg/L	161 mg/L

* Collective daily maximum concentrations are determined on the basis of composite samples composed of flow weighted portions of a minimum of four grab samples of each active outfall except 004, collected at two hour intervals. That is, the concentration will be determined from either (a) the flow weighted average of the composite samples taken from each discharging outfall or (b) one composite sample made up of four flow weighted grab samples from each discharging outfall.

** Collective 30-day average concentrations are determined on the basis of not less than three grab sample and analyses of the flow proportioned discharges collected at intervals of not less than seven days during any 30-day period.

(v) The maximum daily load of total nitrogen in the combined direct and seepage discharge shall not exceed 553 pounds.

(vi) The maximum daily load of total phosphorus in the combined direct and seepage discharge shall not exceed 111 pounds.

The nutrient load limits specified in items (v) and (vi) above are required to be met on a three year running average, with no single year exceeding these levels by more than 10%. The specified limits are intended to achieve pre-1983 nutrient loading levels in voluntary compliance with the nondegradation standard.

(vii) The pH of the discharge shall be within the range of 6.0 and 9.0 standard units, unless due to natural biological processes.

(viii) There shall be no discharge of floating solids or visible foam in amounts which will or are likely to create to a nuisance or render the waters harmful, detrimental, or injurious to public health, recreation, safety, welfare, livestock, wild animals, birds, fish or other wildlife.

(ix) There shall be no use of polychlorinated biphenols (PCB's) in plant processes contributing to effluent discharges.

(x) There shall be no use of chlorophenolic-containing biocides in the facility.

(xi) Direct discharge occurring when river flow at USGS station 12353000 is 4,000 cfs or less shall be through the diffuser outfall only.

(xii) Direct discharge shall not occur between July 15 and September 1 of each year unless river flow exceeds 4000 cfs.

(xiii) Direct discharge shall not occur at any time when flow in the river at USGS station 12353000 is less than 1900 cfs.

(xiv) Direct discharge of treated effluents shall not occur when maximum daily temperature at Six-Mile Station is equal to or greater than 65° F.

(xv) Direct discharge of treated effluents shall not occur when the DO concentration is less than 7.1 mg/L.

(xvi) Minimum dilution of direct discharge of treated effluents in the receiving stream shall be 100:1.

(b) Outfall 004

1. Waste discharge through Outfall 004 shall consist entirely of uncontaminated cooling water and shall be limited to a maximum temperature of 95°F.

2. The pH of this discharge shall be within range of 6.0 and 9.0 standard units.

(c) Effective upon issuance of this permit and lasting through its expiration date, there shall be no acute toxicity in the effluent discharged by the facility at any of the outfalls.

2. Monitoring Requirements

(a) River Flow shall be obtained daily at U.S.G.S. Station 12353000.

(b) Maximum daily river temperature shall be obtained from the recorder at Six-Mile Station from June 1 through September 15 during direct discharge.

(c) Flow measurement in the discharge pipes must indicate values within 10% of the true flow value. The Environmental Protection Agency and the Department shall determine the adequacy of the flow measuring equipment.

(d) Stone Container shall maintain continuous specific conductance monitoring at the clarifier with an alarm system to the mill and daily pH monitoring at the clarifier for early spill and upset detection. The data record shall be maintained on-site to verify functioning to inspecting Department personnel.

(e) The permittee shall collect grab samples from each pond containing at least one-fourth of its capacity as measured by pond stage. The analytical parameters and sampling frequency shall be according to Table 2. Wastewater ponds containing less than one-fourth of capacity shall be reported as such. The stored volume and remaining capacity of each pond shall be determined monthly.

Table 2. Pond monitoring requirements.

Parameter	Frequency	Sample Type
BOD_5	Once every two weeks	Grab
Sodium	Once every two weeks	Grab
Color	Once every two weeks	Grab
pH	Once every two weeks	Grab

(f) The permittee shall monitor each direct discharge in accordance with Table 3.

Table 3. Direct discharge monitoring requirements.

Parameter	Frequency	Sample Type
Flow	Continuously	Recorder
BOD_5	Weekly	Composite
Total Nitrogen as N*	Weekly	Grab
Total Phosphorus as P*	Weekly	Grab
Total Suspended Solids	Weekly	Composite
pH	Weekly	Grab

*Includes total Kjeldahl nitrogen, nitrate plus nitrite as nitrogen, ammonia nitrogen and soluble orthophosphate.

(g) The permittee shall use USGS station 12353000 to monitor river flow. The river shall be sampled daily for color at Harper's Bridge and Six-Mile when effluent discharge rates are constant and recorded changes in river flow are 10 percent or less for the previous 24 hours. The river shall be sampled twice daily for color at Harper's Bridge and Six-Mile locations when the recorded river flow changes are greater than 10 percent for the previous 24 hours. Upstream and downstream paired sampling times shall be reasonably close together and shall be reported along with the color data. During periods of no direct discharge, the river shall be sampled in both locations for color once per day.

(h) The permittee shall monitor test wells 1R, 2R, 4R, 5R and 514 once every two months for static water level, BOD_5, color, total nitrogen and total phosphorus. Wells SMW-9 through SMW-14 shall be monitored quarterly for the same parameters.

(i) Discharge #004 shall be monitored weekly for flow, temperature and pH by instantaneous measurement in the drain ditch prior to entry into the river.

(j) Discharge #004 shall be monitored by visual inspection daily for the presence of oil sheen or foam.

(k) During periods of direct discharge the permittee shall monitor the Clark Fork River at Harpers Bridge and Six-Mile Station for dissolved oxygen (D.O.) and nutrients as specified in Table 4.

Table 4. Instream DO monitoring and nutrient monitoring requirements during direct discharge.

DO		Nutrients		
Instream conditions	Frequency	Instream Conditions at Harper's Bridge	Frequency	
			Nitrogen*	Phosphorus*
DO ≥ 9 mg/L	Weekly	Flow > 4,000 cfs	Weekly	Weekly
DO ≥ 7.1< 9 mg/L	Alternate days	Flow ≤ 4,000 cfs	Every 2 wks	Every 2 wks

*Includes total Kjeldahl nitrogen, nitrate plus nitrite as nitrogen, ammonia nitrogen and soluble orthophosphate.

During periods of no direct discharge DO shall be monitored weekly and nutrients monitored on a bi-weekly basis. DO sampling shall occur during the one-hour period preceeding sunrise.

3. Whole Effluent Toxicity (WET) Testing - Acute Toxicity

Starting in the first calendar quarter following the effective date of the permit, the permittee shall, at least once each calendar quarter conduct an acute static replacement toxicity test on an undiluted composite/grab sample of the effluent. Testing will employ two species per testing period. Samples shall be collected on a two day progression; i.e., if the first quarterly sampling is on a Monday, the second quarterly sample shall occur on a Wednesday, etc. Saturdays, Sundays and Holidays will be skipped in the progression.

The replacement static toxicity tests shall be conducted in accordance with the procedures set out in the latest revision of Methods for Measuring the Acute Toxicity of Effluents to Freshwater and Marine Organisms, EPA-600/4-90/027F (Rev. August 1993) and "Region VIII EPA NPDES Acute Test Conditions - Static Renewal Whole Effluent Toxicity". In the case of conflicts, the Region VIII document will prevail. The permittee shall conduct an acute 48-hour static renewal toxicity test using *Ceriodaphnia dubia* and an acute 96-hour static renewal toxicity test using *Pimephales promelas* as the test species.

Acute toxicity occurs when 50 percent or more mortality is observed for either species at any effluent concentration. If more than 10 percent control mortality occurs, the test is considered invalid and shall be repeated until satisfactory control survival is achieved.

If acute toxicity occurs in a routine test, an additional test shall be conducted within 30 days of the date the permittee became aware of the test failure. Should acute toxicity occur in the second test, testing shall occur monthly until further notified by the Department.

Quarterly test results shall be reported along with the Discharge Monitoring Report (DMR) form submitted for the end of the reporting calendar quarter. For example, WET testing results for the reporting period ending March shall be reported with the March DMR due on April 28; results of the second quarter WET test shall be reported with the June DMRs. The format for the report shall be consistent with the latest revision of Region VIII Guidance for Acute Whole Effluent Reporting, and shall include all chemical and physical data as specified.

4. Toxicity Reduction Evaluation (TRE)

If toxicity is detected, and it is determined by the Department that a TRE is necessary, the permittee shall be notified and shall initiate a TRE immediately thereafter. The purpose of the TRE will be to establish the cause of the toxicity, locate the source(s) of the toxicity, and control or provide treatment for the toxicity prior to the deadline for compliance contained in Part I.C.1.(c) of this permit.

If the TRE establishes that the toxicity cannot be eliminated, the permittee shall submit a proposed compliance plan to the Department. The plan shall include the proposed approach to control toxicity and proposed compliance schedule acceptable to the Department.

If the TRE shows that the toxicity is cause by a toxicant(s) that may be controlled with specific numerical limitations, the permittee may:

a. Submit an alternative control program for compliance with the numerical requirements.

b. If necessary, provide a modified whole effluent testing protocol which compensates for the pollutant(s) being controlled numerically.

If acceptable to the Department, this permit may be reopened and modified to incorporate any additional numerical limitations, a modified compliance schedule if judged necessary by the Department, or a modified whole effluent protocol.

Failure to conduct an adequate TRE, or failure to submit a plan or program as described above, or the submittal of a plan or program judged inadequate by the Department, shall in no way relieve the permittee from the compliance requirement contained in Part I.C.1.(c) of this permit.

D. Mixing Zone

As described by Hydrometrics, Inc. (1996) for Stone Container Corporation, the bank-to-bank and downstream extents of the existing mixing zone vary with Clark Fork River discharge. Complete mixing occurs within four miles downstream of outfall 003 at low flow (2,642 cfs). Complete mixing was not measured 7.5 miles downstream of 003 during high flow (26,630 cfs). The estimated high flow, longitudinal mixing zone extent is 11.5 miles downstream of outfall 003.

The combined discharge is granted a source-specific mixing zone for color in the Clark Fork River extending from the southern boundary of Section 23, Township 14 North, Range 21 West, to the Six-Mile sampling station. The extent of the surface water mixing zone is illustrated in Attachment 1 of this permit.

II. MONITORING, RECORDING AND REPORTING REQUIREMENTS

A. Representative Sampling.

Samples taken in compliance with the monitoring requirements established under Part I shall be collected from the effluent stream prior to discharge into the receiving waters. Samples and

measurements shall be representative of the volume and nature of the monitored discharge.

B. Monitoring Procedures.

Monitoring must be conducted according to test procedures approved under Part 136, Title 40 of the Code of Federal Regulations, unless other test procedures have been specified in this permit. Color procedure may be as presented in the National Council for Air and Stream Improvement, "Technical Bulletin 253, December, 1971. All flow-measuring and flow-recording devices used in obtaining data submitted in self-monitoring reports must indicate values within 10 percent of the actual flow being measured.

C. Penalties for Tampering.

The Montana Water Quality Act provides that any person who falsifies, tampers with, or knowingly renders inaccurate, any monitoring device or method required to be maintained under this permit shall, upon conviction, be punished by a fine of not more than $10,000, or by imprisonment for not more than six months, or by both.

D. Reporting of Monitoring Results.

Effluent monitoring results obtained during the previous month(s) shall be summarized for each month and reported on a Discharge Monitoring Report Form (EPA No. 3320-1), postmarked no later than the 28th day of the month following the completed reporting period. If no discharge occurs during the reporting period, "no discharge" shall be reported. Whole effluent toxicity (biomonitoring) results must be reported on the most recent version of EPA Region VIII's "Guidance For Whole Effluent Reporting". Legible copies of these, and all other reports required herein, shall be signed and certified in accordance with the Signatory Requirements" (see Part IV of this permit), and submitted to the Department and the Regional Administrator at the following addresses:

a) Montana Department of
Environmental Quality
Water Protection Bureau
P.O. Box 200901
Helena, Montana 59620-0901
Phone: (406) 444-3080

b) U.S. Environmental Protection Agency
301 South Park Avenue
Drawer 10096
Helena, Montana 59626
Phone: (406) 441-1140

E. Compliance Schedules.

Reports of compliance or noncompliance with, or any progress reports on interim and final requirements contained in any Compliance Schedule of this permit shall be submitted no later than 14 days following each schedule date.

F. Additional Monitoring by the Permittee.

If the permittee monitors any pollutant more frequently than required by this permit, using approved analytical methods as specified in this permit, the results of this monitoring shall be included in the calculation and reporting of the data submitted in the Discharge Monitoring Report. Such increased frequency shall also be indicated.

G. Records Contents.

Records of monitoring information shall include:

1. The date, exact place, and time of sampling or measurements;

2. The initials or name(s) of the individual(s) who performed the sampling or measurements;

3. The date(s) analyses were performed;

4. The time analyses were initiated;

5. The initials or name(s) of individual(s) who performed the analyses;

6. References and written procedures, when available, for the analytical techniques or methods used; and,

7. The results of such analyses, including the bench sheets, instrument readouts, computer disks or tapes, etc., used to determine these results.

H. Retention of Records.

The permittee shall retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports required by this permit, and records of all data used to complete the application for this permit, for a period of at least three years from the date of the sample, measurement, report or application. This period may be extended by request of the Department at any time. Data collected on site, copies of Discharge Monitoring Reports, and a copy of this MPDES permit must be maintained on site during the duration of activity at the permitted location.

I. Twenty-four Hour Notice of Noncompliance Reporting.

1. The permittee shall report any serious incidents of noncompliance as soon as possible, but no later than twenty-four (24) hours from the time the permittee first became aware of the circumstances. The report shall be made to the Water Protection Bureau at (406) 444-3080 or the Office of Disaster and Emergency Services at (406) 444-6911. The following examples are considered serious incidents:

   a. Any noncompliance which may seriously endanger health or the environment;

   b. Any unanticipated bypass which exceeds any effluent limitation in the permit (See Part III.G of this permit, "Bypass of Treatment Facilities".); or,

   c. Any upset which exceeds any effluent limitation in the permit (See Part III.H of this permit, "Upset Conditions".).

2. A written submission shall also be provided within five days of the time that the permittee becomes aware of the circumstances. The written submission shall contain:

   a. A description of the noncompliance and its cause;

   b. The period of noncompliance, including exact dates and times;

   c. The estimated time noncompliance is expected to continue if it has not been corrected; and,

   d. Steps taken or planned to reduce, eliminate, and prevent reoccurrence of the noncompliance.

3. The Department may waive the written report on a case-by-case basis if the oral report has been received within 24 hours by the Water Protection Bureau, by phone, (406) 444-3080.

4. Reports shall be submitted to the addresses in Part II.D of this permit, "Reporting of Monitoring Results".

J. Other Noncompliance Reporting.

Instances of noncompliance not required to be reported within 24 hours shall be reported at the time that monitoring reports for Part II.D of this permit are submitted. The reports shall contain the information listed in Part II.I.2 of this permit.

K. Inspection and Entry.

The permittee shall allow the Director, or an authorized representative thereof, upon the presentation of credentials and other documents as may be required by law, to:

1. Enter upon the permittee's premises where a regulated facility or activity is located or conducted, or where records must be kept under the conditions of this permit;

2. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

3. Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this permit; and

4. Sample or monitor at reasonable times, for the purpose of assuring permit compliance, any substances or parameters at any location.

III. COMPLIANCE RESPONSIBILITIES

A. Duty to Comply.

The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes

a violation of the Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. The permittee shall give the Department or the Regional Administrator advance notice of any planned changes at the permitted facility or of an activity which may result in permit noncompliance.

B. Penalties for Violations of Permit Conditions.

The Montana Water Quality Act provides that any person who violates a permit or condition of the Act is subject to civil or criminal penalties not to exceed $25,000 per day or one year in prison, or both, for the first conviction, and $50,000 per day of violation or by imprisonment for not more than two years, or both, for subsequent convictions. MCA 75-5-611(a) also provides for administrative penalties not to exceed $10,000 for each day of violation and up to a maximum not to exceed $100,000 for any related series of violations. Any person who willfully or negligently violates permit conditions of the Act is subject to a fine of not more than $50,000 per day of violation, or by imprisonment for not more than 2 years, or both. Except as provided in permit conditions on Part III.G of this permit, "Bypass of Treatment Facilities" and Part III.H of this permit, "Upset Conditions", nothing in this permit shall be construed to relieve the permittee of the civil, administrative or criminal penalties for noncompliance.

C. Need to Halt or Reduce Activity not a Defense.

It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

D. Duty to Mitigate.

The permittee shall take all reasonable steps to minimize or prevent any discharge in violation of this permit which has a reasonable likelihood of adversely affecting human health or the environment.

E. Proper Operation and Maintenance.

The permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance also includes adequate laboratory controls and appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems which are installed by a permittee only when the operation is necessary to achieve compliance with the conditions of the permit. However, the permittee shall operate, as a minimum, one complete set of each main line unit treatment process whether or not this process is needed to achieve permit effluent compliance.

F. Removed Substances.

Collected screenings, grit, solids, sludges, or other pollutants removed in the course of treatment shall be disposed of in such a manner so as to prevent any pollutant from entering any waters of the state or creating a health hazard. Any sludges removed from the facility shall be disposed of in accordance with 40 CFR 503, 258 or other applicable rule. EPA and MDEQ shall be notified at least 180 days

prior to such disposal taking place.

G. Bypass of Treatment Facilities.

1. Bypass not exceeding limitations. The permittee may allow any bypass to occur which does not cause effluent limitations to be exceeded, but only if it also is for essential maintenance to assure efficient operation. These bypasses are not subject to the provisions of Parts III.G.2 and III.G.3 of this permit.

2. Notice:

a. Anticipated bypass. If the permittee knows in advance of the need for a bypass, it shall submit prior notice, if possible at least 60 days before the date of the bypass.

b. Unanticipated bypass. The permittee shall submit notice of an unanticipated bypass as required under Part II.I, "Twenty-four Hour Reporting".

3. Prohibition of bypass.

(a). Bypass is prohibited and the Department may take enforcement action against a permittee for a bypass, unless:

(i) The bypass was unavoidable to prevent loss of life, personal injury, or severe property damage;

(ii) There were no feasible alternatives to the bypass, such as the use of auxiliary treatment facilities, retention of untreated wastes, or maintenance during normal periods of equipment downtime. This condition is not satisfied if adequate back-up equipment should have been installed in the exercise of reasonable engineering judgement to prevent a bypass which occurred during normal periods of equipment downtime or preventive maintenance; and,

(iii) The permittee submitted notices as required under Part III.G.2 of this permit.

(b). The Department may approve an anticipated bypass, after considering its adverse effects, if the Department determines that it will meet the three conditions listed above in Part III.G.3.a of this permit.

H. Upset Conditions.

1. Effect of an upset. An upset constitutes an affirmative defense to an action brought for noncompliance with technology based permit effluent limitations if the requirements of Part III.H.2 of this permit are met. No determination made during administrative review of claims that noncompliance was caused by upset, and before an action for noncompliance, is final administrative action subject to judicial review (i.e., Permittees will have the opportunity for a judicial determination on any claim of upset only in an enforcement action brought for noncompliance with technology-based permit effluent limitations).

2. Conditions necessary for a demonstration of upset. A permittee who wishes to establish the affirmative defense of upset shall demonstrate, through properly signed, contemporaneous operating logs, or other relevant evidence that:

   (a). An upset occurred and that the permittee can identify the cause(s) of the upset;

   (b). The permitted facility was at the time being properly operated;

   (c). The permittee submitted notice of the upset as required under Part II.I of this permit, "Twenty-four Hour Notice of Noncompliance Reporting"; and,

   (d). The permittee complied with any remedial measures required under Part III.D of this permit, "Duty to Mitigate".

3. Burden of proof. In any enforcement proceeding, the permittee seeking to establish the occurrence of an upset has the burden of proof.

I. Toxic Pollutants.

The permittee shall comply with effluent standards or prohibitions established under Section 307(a) of the Act for toxic pollutants within the time provided in the regulations that establish those standards or prohibitions, even if the permit has not yet been modified to incorporate the requirement.

J. Changes in Discharge of Toxic Substances.

Notification shall be provided to the Department as soon as the permittee knows of, or has reason to believe:

1. That any activity has occurred or will occur which would result in the discharge, on a routine or frequent basis, of any toxic pollutant which is not limited in the permit, if that discharge will exceed the highest of the following "notification levels":

   (a). One hundred micrograms per liter (100 µg/*l*);

   (b). Two hundred micrograms per liter (200 µg/*l*) for acrolein and acrylonitrile; five hundred micrograms per liter (500 µg/*l*) for 2,4-dinitrophenol and for 2-methyl-4, 6-dinitrophenol; and one milligram per liter (1 mg/*l*) for antimony;

   (c). Five (5) times the maximum concentration value reported for that pollutant in the permit application in accordance with 40 CFR 122.21(g)(7); or,

   (d). The level established by the Director in accordance with 40 CFR 122.44(f).

2. That any activity has occurred or will occur which would result in any discharge, on a non-routine or infrequent basis, of a toxic pollutant which is not limited in the permit, if that discharge will exceed the highest of the following "notification levels":

(a). Five hundred micrograms per liter (500 µg/*l*);

(b). One milligram per liter (1 mg/*l*) for antimony:

(c). Ten (10) times the maximum concentration value reported for that pollutant in the permit application in accordance with 40 CFR 122.21(g)(7); or,

(d). The level established by the Department in accordance with 40 CFR 122.44(f).

IV. GENERAL REQUIREMENTS

A. Planned Changes.

The permittee shall give notice to the Department as soon as possible of any planned physical alterations or additions to the permitted facility. Notice is required only when the alteration or addition could significantly change the nature or increase the quantity of pollutant discharged. This notification applies to pollutants which are not subject to effluent limitations in the permit.

B. Anticipated Noncompliance.

The permittee shall give advance notice to the Department of any planned changes in the permitted facility or activity which may result in noncompliance with permit requirements.

C. Permit Actions.

This permit may be modified, revoked and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance, does not stay any permit condition.

D. Duty to Reapply.

If the permittee wishes to continue an activity regulated by this permit after the expiration date of this permit, the permittee must apply for and obtain a new permit. The application must be submitted at least 180 days before the expiration date of this permit.

E. Duty to Provide Information.

The permittee shall furnish to the Department, within a reasonable time, any information which the Department may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The permittee shall also furnish to the Department, upon request, copies of records required to be kept by this permit.

F. Other Information.

When the permittee becomes aware that it failed to submit any relevant facts in a permit application,

or submitted incorrect information in a permit application or any report to the Department, it shall promptly submit such facts or information.

G. Signatory Requirements.

All applications, reports or information submitted to the Department shall be signed and certified.

1. All permit applications shall be signed as follows:

   (a). For a corporation: by a responsible corporate officer;

   (b). For a partnership or sole proprietorship: by a general partner or the proprietor, respectively;

   (c). For a municipality, State, Federal, or other public agency: by either a principal executive officer or ranking elected official.

2. All reports required by the permit and other information requested by the Department shall be signed by a person described above or by a duly authorized representative of that person. A person is considered a duly authorized representative only if:

   (a). The authorization is made in writing by a person described above and submitted to the Department, and,

   (b). The authorization specified either an individual or a position having responsibility for the overall operation of the regulated facility or activity, such as the position of plant manager, operator of a well or a well field, superintendent, position of equivalent responsibility, or an individual or position having overall responsibility for environmental matters for the company. (A duly authorized representative may thus be either a named individual or any individual occupying a named position.)

3. Changes to authorization. If an authorization under Part IV.G.2 of this permit is no longer accurate because a different individual or position has responsibility for the overall operation of the facility, a new authorization satisfying the requirements of Part IV.G.2 of this permit must be submitted to the Department prior to or together with any reports, information, or applications to be signed by an authorized representative.

4. Certification. Any person signing a document under this section shall make the following certification:

   "I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false

information, including the possibility of fine and imprisonment for knowing violations."

H. Penalties for Falsification of Reports.

The Montana Water Quality Act provides that any person who knowingly makes any false statement, representation, or certification in any record or other document submitted or required to be maintained under this permit, including monitoring reports or reports of compliance or noncompliance shall, upon conviction be punished by a fine of not more than $10,000 per violation, or by imprisonment for not more than two years per violation, or by both.

I. Availability of Reports.

Except for data determined to be confidential under 40 CFR Part 2, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the offices of the Department. As required by the Clean Water Act, permit applications, permits and effluent data shall not be considered confidential.

J. Oil and Hazardous Substance Liability.

Nothing in this permit shall be construed to preclude the institution of any legal action or relieve the permittee from any responsibilities, liabilities, or penalties to which the permittee is or may be subject under Section 311 of the Clean Water Act.

K. Property or Water Rights.

The issuance of this permit does not convey any property rights of any sort, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations.

L. Severability.

The provisions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected hereby.

M. Transfers.

This permit may be automatically transferred to a new permittee if:

1. The current permittee notifies the Department at least 30 days in advance of the proposed transfer date;

2. The notice includes a written agreement between the existing and new permittees containing a specific date for transfer of permit responsibility, coverage, and liability between them; and,

3. The Department does not notify the existing permittee and the proposed new permittee of his or her intent to modify, or revoke and reissue the permit. If this notice is not received, the transfer is effective on the date specified in the agreement mentioned in Part VI.M.2 of this permit.

4. Required annual and application fees have been paid.

N. Fees.

The permittee is required to submit payment of an annual fee as set forth in ARM 17.30.201. If the permittee fails to pay the annual fee within 90 days after the due date for the payment, the Department may:

1. Impose an aditional assessment consisting of 15% of the fee plus interest on the required fee computed at the rate established under 15-31-510(3), MCA, or

2. Suspend the processing of the application for a permit or authorization or, if the nonpayment involves an annual permit fee, suspend the permit, certificate or authorization for which the fee is required. The Department may lift suspension at any time up to one year after the suspension occurs if the holder has paid all outstanding fees, including all penalties, assessments and interest imposed under this sub-section. Suspensions are limited to one year, after which the permit will be terminated.

O. Reopener Provisions.

This permit may be reopened and modified (following proper administrative procedures) to include the appropriate effluent limitations (and compliance schedule, if necessary), or other appropriate requirements if one or more of the following events occurs:

1. Water Quality Standards: The water quality standards of the receiving water(s) to which the permittee discharges are modified in such a manner as to require different effluent limits than contained in this permit.

2. TMDL or Wasteload Allocation: TMDL requirements or a wasteload allocation is developed and approved by the Department and/or EPA for incorporation in this permit.

3. Water Quality Management Plan: A revision to the current water quality management plan is approved and adopted which calls for different effluent limitations than contained in this permit.

4. Sludge: There have been substantial changes (or such changes are planned) in sludge use or disposal practices; applicable management practices or numerical limitations for pollutants in sludge have been promulgated which are more stringent than the requirements in this permit; and/or it has been determined that the permittee's sludge use or disposal practices do not comply with existing applicable state or federal regulations.

5. Toxic Pollutants: A toxic standard or prohibition is established under Section 307(a) of the Act for a toxic pollutant which is present in the discharge and such standard or prohibition is more

stringent than any limitation for such pollutant in this permit.

6. Toxicity Limitation. Change in the whole effluent protocol, or any other conditions related to the control of toxicants have taken place, or if one or more of the following events have occurred:

(a). Toxicity was detected late in the life of the permit near or past the deadline for compliance.

(b). The TRE/TIE results indicate that compliance with the toxic limits will require an implementation schedule past the date for compliance and the permit issuing authority agrees with the conclusion.

(c). The TRE/TIE results indicate that the toxicant(s) represent pollutant(s) that may be controlled with specific numerical limits, and the permit issuing authority agrees that numerical controls are the most appropriate course of action.

(d). Following the implementation of numerical controls on toxicants, the permit issuing authority agrees that a modified whole effluent protocol is needed to compensate for those toxicants that are controlled numerically.

(e). The TRE/TIE reveals other unique conditions or characteristics which, in the opinion of the permit issuing authority, justify the incorporation of unanticipated special conditions in the permit.

V. Additional Requirement

A. Ground Water Mixing Zone Delineation.

The Stone Container Corporation shall submit to the Department, within 180 days of issuance of this permit, a plan for conducting an investigation of the ground water adjacent and down-gradient of the wastewater treatment and storage pond system. The investigation must be sufficient to determine the boundaries of the existing ground water mixing zone with regard to total dissolved solids (TDS). The mixing zone boundaries shall encompass the area of the aquifer where the TDS is greater than 500 mg/L. The investigation shall also allow for classification of the ground water according to ARM (17.30.1005).

A final investigation report must be completed and submitted to the Department within two years of Department approval of the investigation plan.

B. Storage.

The permittee shall provide at least 10 days retention time following aeration of the wastewater before it is direct discharged to the Clark Fork River.

C. Cessation of Direct Discharge.

The permittee shall immediately cease direct surface discharge upon receipt of verbal or written instructions to do so by the Department.

D. Violation of Water Quality Standards.

If the analytical results of river water quality monitoring show violation of established water quality standards outside of the mixing zone, including the introduction of taste and odor problems, this permit may be modified to specify additional control measures to ensure compliance with water quality standards.

E. Additional Wastewater Monitoring and Reporting

The permittee shall report on a monthly basis cumulative BOD_5 and TSS loads discharged (including through seepage) beginning January 1 of each year.

F. Technique for Calculation of Total Annual BOD Discharge Limitations

The total annual BOD_5 discharge shall be the sum of the total BOD_5 discharged by direct surface discharge and the total BOD_5 discharged to the ground waters by seepage. The term seepage shall include the volume disposed of through the storage and treatment pond system. The procedure for calculating the amount of BOD_5 contributed by seepage shall be approved by the Department.

Montana Department of
ENVIRONMENTAL QUALITY

PERMITTING AND COMPLIANCE DIVISION
WASTE AND UNDERGROUND TANK MANAGEMENT BUREAU
SOLID WASTE LICENSING PROGRAM
PO BOX 200901
HELENA, MT 59620-0901
406-444-5300

STATE OF MONTANA

SOLID WASTE MANAGEMENT SYSTEM

ANNUAL LICENSE RENEWAL

LICENSE NUMBER 359

M2GREEN REDEVELOPMENT, LLC

IS LICENSED TO OPERATE THE

M2GREEN REDEVELOPMENT, LLC - MISSOULA SITE
MINOR CLASS III FACILITY

(FOR THE DISPOSAL OF LESS THAN 1,000 TONS ANNUALLY)

LOCATED AT

14377 PULP MILL ROAD, MISSOULA, MT 59806

MISSOULA COUNTY

FOR THE PERIOD

JULY 1, 2012 TO JUNE 30, 2013

THIS ANNUAL LICENSE IS CONDITIONED ON THE CONSTRUCTION AND MANAGEMENT OF THE SYSTEM AS APPROVED BY THE DEPARTMENT AND ON CONDITIONS IMPOSED BY THE ORIGINAL LICENSE. THE LICENSEE SHOULD BE AWARE THAT ITS FAILURE TO COMPLY WITH APPLICABLE LAW OR RULE, IN PARTICULAR TITLE 75, CHAPTER 10, PARTS 1 AND 2, MONTANA CODE ANNOTATED, AND ADMINISTRATIVE RULES OF MONTANA TITLE 17, CHAPTER 50, SUB-CHAPTERS 4, 5, AND 10 - 14, INCLUDING THE PAYMENT OF APPLICABLE FEES, MAY RESULT IN ENFORCEMENT ACTIONS, LICENSE REVOCATION, OR DENIAL OF AN APPLICATION FOR RENEWAL.

EDWARD A. THAMKE, BUREAU CHIEF
WASTE AND UNDERGROUND TANK MANAGEMENT BUREAU

THIS CERTIFICATE IS NOT TRANSFERABLE. A LICENSE RENEWAL APPLICATION IS DUE APRIL 1, 2013.

M2G 100187

MONTANA DEQ ANNUAL PERMIT

MTF11-0003-00

In compliance with Mont. Code Ann. § 75-2-504 and Admin. Rule of Mont. 17.74.359,

M2Green Redevelopment
14377 Pulp Mill Road
PO Box 4707
Missoula, MT 59808-4707

is authorized by the MT DEQ Asbestos Control Program to conduct asbestos projects at:

M2Green Redevelopment (formerly known as Smurfit-Stone Container)
14377 Pulp Mill Road
PO Box 4707
Missoula, MT 59808-4707

The following outside asbestos project contractor is also permitted by the MT DEQ Asbestos Control Program to perform asbestos projects at this facility under this Annual Permit:

Abatement Contractors of Montana LLC
PO Box 8747
Missoula, MT 59802

Permit effective date: September 23, 2011 **Permit expiration date: September 22, 2012**

Conditions of this permit: M2Green Redevelopment (formerly known as Smurfit-Stone Container and Abatement Contractors of Montana, LLC, shall be subject to the facility's asbestos health and safety program. Asbestos projects performed pursuant to the authorization of the Annual Asbestos Project Permit will be performed in accordance with MCA §§ 75-2-501 through -519, ARM 17.74.301 through -406, the Montana Asbestos Work Practices and Procedures Manual (2005), and EPA NESHAP 40 CFR Part 61 subpart M. Only MT DEQ-accredited asbestos project workers and contractor/supervisors shall be permitted to perform asbestos projects at this facility. Asbestos projects shall be notified to the MT DEQ 10 working days prior to conducting work. In addition, all regulated asbestos-containing waste materials generated at this facility will be transported properly by Abatement Contractors of Montana, LLC, and disposed of in the Allied Waste asbestos landfill in Missoula, Montana.

For the Montana Department Environmental Quality

Deborah Grimm CIH

Deborah Grimm, CIH
MT DEQ Asbestos Control Program
1520 East Sixth Ave, PO Box 200901, Helena, MT 59620-0901
(406) 444-5300 / FAX (406) 444-1374

Dated this 23rd day of September, 2011.

M2G 100188

MONTANA DEQ ANNUAL PERMIT

MTF12-0022-00

In compliance with Mont. Code Ann. § 75-2-504 and Admin. Rule of Mont. 17.74.359,

M2Green Redevelopment
14377 Pulp Mill Road
PO Box 4707
Missoula, MT 59808-4707

is authorized by the MT DEQ Asbestos Control Program to conduct asbestos projects to remove 2500 linear feet of TSI, 2500 sq ft of tar tank coating, 300 sq ft of tank mag, 250 each mudded fittings:

M2Green Redevelopment (formerly known as Smurfit-Stone Container)
14377 Pulp Mill Road
PO Box 4707
Missoula, MT 59808-4707

The following outside asbestos project contractor is also permitted by the MT DEQ Asbestos Control Program to perform asbestos projects at this facility under this Annual Permit:

Abatement Contractors of Montana LLC
PO Box 8747
Missoula, MT 59802

Permit effective date: December 6, 2012 **Permit expiration date: December 6, 2013**

Conditions of this permit: M2Green Redevelopment (formerly known as Smurfit-Stone Container) and Abatement Contractors of Montana, LLC, shall be subject to the facility's asbestos health and safety program. Asbestos projects performed pursuant to the authorization of the Annual Asbestos Project Permit will be performed in accordance with MCA §§ 75-2-501 through -519, ARM 17.74.301 through -406, and EPA NESHAP 40 CFR Part 61 subpart M. Only MT DEQ-accredited asbestos project workers and contractor/supervisors shall be permitted to perform asbestos projects at this facility. Affinity Environmental will conduct final clearance activities. Asbestos projects shall be notified to the MT DEQ 10 working days prior to conducting work. In addition, all regulated asbestos-containing waste materials generated at this facility will be transported properly by Abatement Contractors of Montana, LLC, and disposed of in the Allied Waste asbestos landfill in Missoula, Montana.

For the Montana Department Environmental Quality

Rich Morse
MT DEQ Asbestos Control Program
1520 East Sixth Ave, PO Box 200901, Helena, MT 59620-0901
(406) 444-5300 / FAX (406) 444-1374

Dated this 6th day of December, 2012.

M2G 100189